

UK Modern Slavery Act Transparency Statement for the Financial Year Ending 31 December 2024



**Graphic
Packaging**
INTERNATIONAL

I. SCOPE

This Modern Slavery Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It provides an update on the steps undertaken by Graphic Packaging International Europe UK Limited, a subsidiary of Graphic Packaging International, LLC. and other relevant GPI group companies¹ ("GPI", "Graphic Packaging", the "Group", the "Company", "we", "our", "us") during year ending 2024 to mitigate the risks of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery") across our business and supply chain.

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 we took during 2024 to prevent and reduce the risk that modern slavery, forced or compulsory labour, human trafficking, and child labour, pose to our operations and supply chain in the UK and beyond. We have continued to build on previous efforts with increased focus on preventing Modern Slavery in our operations and supply chain. We remain committed to fair labour practices and the depth and scope of our work on Modern Slavery. We recognise the increasing threat labour exploitation and Modern Slavery pose and our customers and suppliers share our concern.

We are pleased to report for the calendar year ending 31 December 2024 no instances of Modern Slavery were identified within our operations.

A. Our Operations

Graphic Packaging is one of the largest manufacturers of paperboard and paper-based packaging for some of the world's most recognized brands of food, beverage, foodservice, and other consumer products. The company operates on a global basis, and its history extends more than 100 years, as numerous legacy companies have joined forces to create an ever-evolving corporation. We currently have over 100 locations worldwide which are committed to providing consumer packaging that makes a world of difference. With a product portfolio that emphasizes renewable, recycled, and recyclable materials, we are as committed to our customers and 23,000+ employees as we are to protecting the environment and giving back to the communities where we live and work. For the year ended 31 December 2024, our net sales were \$8.8 billion USD.

In the United Kingdom, Graphic Packaging employs approximately 1680 full time employees across nine facilities, including locations in Bardon, Bristol, Gateshead, Highbridge, Leeds, Newcastle, Rotherham, Sheffield, and Winsford. Our team is focused on maintaining efficient, safe and ethical working practices in a changing environment with constantly evolving products.

¹ This statement sets out the steps taken under section 54 of the Modern Slavery Act 2015 by the following Graphic Packaging International, LLC subsidiaries: Graphic Packaging International Bardon Limited, Graphic Packaging International Limited, Graphic Packaging International Gateshead Limited, Graphic Packaging International Europe UK Limited, Graphic Packaging International Foodservice Europe Ltd, GPI Cambridge Ltd, GPI Highbridge Ltd, GPI Rotherham Ltd.

We offer a broad range of packaging of food, beverage and foodservice products and work closely with retailers in the food industry to bring food packaging design concepts to life. Our team is focused on maintaining efficient, safe and ethical working practices in a changing environment with constantly evolving products.

For more information about Graphic Packaging and our locations, please review our website at <https://www.graphicpkg.com>.

B. Our Supply Chain

We maintain relationships with more than 17,000 raw material, goods and service suppliers across our global supply chain. Our suppliers are vital to our success, and we constantly strive to choose suppliers committed to strong ethics and business conduct standards similar to our own. These standards include a commitment from our suppliers to conduct business responsibly, with integrity, honesty and transparency and to prohibit the use of child labour and all forms of modern slavery.

We train global buyers annually on business ethics, anti-bribery awareness, preventing forced labour and child labour, export restrictions and other topics through our annual ethics training.

Our procurement team considers both environmental and social impacts in its purchasing decisions and is committed to increasing diversity within our supplier base. We track diverse supplier spend across a subset of diverse suppliers in support of customer supply chain diversity initiatives. This supplier group includes women-owned, minority/ethnically diverse, and disabled-owned suppliers. These diverse suppliers provided a significant range of goods and services that spanned the entire spectrum of supply chain categories, from marketing to transportation to maintenance and packaging services and supported multiple sites across the company.

Our six North American paperboard manufacturing facilities produce unbleached paperboard, bleached paperboard and recycled paperboard. Our UK packaging plants consume paperboard supplied from our own paperboard manufacturing facilities in North America and convert other paperboard grades purchased from external suppliers mainly in the UK and continental Europe. We then convert the paperboard into our packaging solutions. We also sell paperboard to a wide variety of independent paperboard packaging manufacturers and brokers. In addition to paperboard, Graphic Packaging works with long-term suppliers for sourcing other key raw material commodities such as printing inks, overprint varnishes, decorative materials, and packaging materials. We believe that these strong supplier relationships are the key to ensuring continuous improvement in supply chain working conditions.

II. CORPORATE GOVERNANCE AND POLICIES

A. Governance

Graphic Packaging's Board of Directors oversee the Company's global compliance strategy and objectives, including the Company's activities, risk management, 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 enterprise 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 Accounting Officer; SVP, Chief Audit, Risk and Compliance Office (CCO); the VP & Chief Labour & Employment Counsel (VPCLEC); VP & Assistant General Counsel; VP, Legal (EMEA), 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 Graphic Packaging's supply chain to minimize the risk of forced labour 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. 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 2024 and is distributed to all employees. To ensure compliance with Graphic Packaging's Code of Conduct and ethical practices, all 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: Global Anti-Harassment and Anti-Discrimination Policy, Revised 2023; Global Anti-Slavery and Human Trafficking Policy, Revised 2023; Global Child Labour & Remediation Policy, Revised 2023; Global Whistleblower Policy, Revised 2024; Global Health and Safety Policy, Revised 2023; Global Human Rights Policy, Revised 2025; Global Supplier Code of Conduct (GSCC), Revised 2024; and our Global Transparency in Supply Chains Act Declaration, Revised 2025. We review and analyze these policies every one to three years.

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 Labour 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.

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. Graphic Packaging continually reviews and updates its policies in consultation with in-house and external experts.

C. Human Rights Practices

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| 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 labour union, participate privately in trade associations, and collectively bargain in accordance with local or national law. |
| Voluntary labour | We do not knowingly engage in forced, compulsory, or bonded labour, and we do not threaten workers or restrict their movement. |
| Child labour | 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. |

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| 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. |

III. ASSESSING AND MANAGING THE RISK

A. Identifying the risk

1. Social Responsibility Audits

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. As we acquire new packaging facilities, we add them to the program and work to complete the SMETA within the first two years after purchase. We currently conduct SMETAs at packaging locations and are in the process of including paperboard manufacturing facilities and one machinery plant in the program. All audits are conducted by a Sedex approved, independent third-party auditor.

Sedex has developed a rigorous four-pillar framework that assesses a site based on the organization's standards for labour, 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 labour rights risks (e.g., forced labour, human trafficking, child labour, freedom of association, right to collective bargaining, equal remuneration, and discrimination). Country risk indicators are drawn from publicly available sources and are chosen according to their coverage, reliability, comparability, and relevance.

The 2024 RADAR risk assessment, conducted across the 26 countries where Graphic Packaging has significant business operations, identified Indonesia, Nigeria, and China as potentially high-risk countries for labour practices. In those flagged countries, our operations include three packaging facilities and one office. The three packaging facilities were acquired in 2021, and underwent further assessment in 2022, 2023, and 2024 – including third-party human rights audits and risk assessments relating to bribery, corruption, and financial practices. All three packaging facilities are

included in our social responsibility auditing program for ongoing monitoring, and employees in these facilities participate in our annual ethics training programs – which include Code of Conduct training for all employees and other ethics and human rights training for salaried individuals. Our office location in China employs fewer than eight salaried employees, who complete annual business ethics training. To our knowledge, no significant human rights risks are present at the three packaging plant locations or at the China office location.

Graphic Packaging is committed to conducting human and labour 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. Through year-end 2024, 100% of packaging facilities completed their annual self-assessment, and 89% were compliant with completing their SMETA audit within the three-year schedule. Scheduling challenges due to auditor availability delayed completing some planned 2024 audits. These facilities are on track to complete their audits early 2025.

Newly acquired manufacturing facilities are required to complete their first online self-assessment within one year and a SMETA audit within three years of joining the Company. We 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.

2. Acquisition Due Diligence

When evaluating a potential target for acquisition, Graphic Packaging engages in a vigorous due diligence process that includes an assessment of human rights risks. The human rights assessment includes a review of relevant policies, analysis of major supply chain agreements and relationships, and assessment of immigration and employment verification processes. Following acquisition, employees are screened to ensure they are legally able to work and onboarded into Graphic Packaging as soon as possible. Newly onboarded employees are also immediately provided with copies of our Code and access to our global Alertline for filing grievances and complaints. There were no acquisitions in 2024.

3. 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 labour, human trafficking, and child labour, are subject to discipline, up to and including termination.

B. Managing and Mitigating the Risk

1. Internal Operations at Risk for Child Labour or Modern Slavery

Most Graphic Packaging employees are employed directly by the Company and their terms and conditions of employment are governed by local, provincial, or national laws. However, we respect the rights of employees to determine whether they will be represented by a collective bargaining representative and believe that employees should exercise those rights in an informed manner based upon the free exchange of information. Approximately 57% of our global employees were represented by elected collective bargaining agents in 2024 and had active collective bargaining agreements providing for their terms and conditions of employment, including our Leeds and Bristol facilities in the UK.

In 2024, we delivered over 375,500 hours of training to salaried employees across the globe via our GPI University program. In 2024, 95% of Graphic Packaging's global salaried employees and 90% of UK and European salaried employees completed training on our Code of Conduct where they were reminded of our Core Values and prohibition against discrimination and harassment. We also ensure our employees are able to identify the early signs of human rights abuses and Modern Slavery in our business and supply chain by providing targeted Modern Slavery training to our salaried employees. Approximately 92% of our UK and European salaried employees and 96% of salaried employees globally completed this training, in 2024.

IV. EFFECTIVENESS IN PREVENTING MODERN SLAVERY

For the year 2024, Graphic Packaging identified the risk of child labour in its operations as low. Likewise, we had no reported incidents of child labour in our UK supply chain in 2024. Our diligence efforts did identify two potential child labour concerns within our supply chain outside of the UK in 2024; however, after investigating these concerns, we determined neither of the issues directly impacted our supply chain. The first potential supplier concern was not substantiated, and no action was required. During the investigation with the second potential concern, we learned the incident was in a segment of the supplier's business wholly unrelated to services it provided to Graphic Packaging, and that the supplier had successfully implemented substantial measures to remediate the situation. Our systems and governance processes allowed us to quickly engage with these suppliers and address identified potential concerns.

With respect to forced or compulsory labour, the Company did not identify any risks in our operations. We did receive an internal Alertline report concerning potential forced/compulsory labour with one supplier. We investigated the report and took necessary steps to mitigate negative impacts to the supplier's employees and ultimately ceased use of that supplier. Our supplier due diligence screening process identified two additional potential incidents of forced/compulsory labour in our supply chain. There is no ongoing business relationship with either supplier at issue. Based on these findings, no further action was deemed necessary.

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.

This report was approved by the Boards of Graphic Packaging International Bardon Limited, Graphic Packaging International Limited, Graphic Packaging International Gateshead Limited, Graphic Packaging International Europe UK Limited, Graphic Packaging International Foodservice Europe Ltd, GPI Cambridge Ltd, GPI Highbridge Ltd, and GPI Rotherham Ltd.

Signed



Lauren Tashma
Executive Vice President, General Counsel and Secretary



Innovation

Build the leading sustainability-focused consumer packaging innovation platform



Culture

Enable a safe, engaged, customer-focused culture



Planet

Steadily and measurably improve the environmental footprint of consumer packaging



Results

Consistently execute for customers, shareholders and all stakeholders