



Graphic Packaging International LLC

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

[Read full terms of disclosure](#)

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(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored. 352

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(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website. 353

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☒ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☒ USD

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:

☒ Publicly traded organization

(1.3.3) Description of organization

Graphic Packaging Holding Company (NYSE: GPK), headquartered in Atlanta, Georgia, designs and produces consumer packaging made primarily from renewable or recycled materials. Graphic Packaging International is the primary operating entity of Graphic Packaging Holding Company. An industry leader in innovation, the Company is a global provider of paperboard consumer packaging solutions that serve food, beverage, foodservice, and other consumer products companies and is committed to reducing the environmental footprint of consumer packaging. The Company maintains a global network of paperboard manufacturing facilities, packaging facilities, machinery facilities, innovation centers, and sales offices located in more than 25 countries, and have a joint-venture interest in packaging operations located in Japan. Graphic Packaging also partners with third-party contractors, as necessary, to complement our manufacturing operations and extend our global reach. Certain statements regarding the expectations of Graphic Packaging, including, but not limited to, the Company's plans or estimates with respect to energy use reductions, water usage, climate related events, and forestry actions in this report constitute "forward-looking statements" as defined in the Private Securities Litigation Reform Act of 1995. Such statements are based on certain assumptions and expectations of future events that may not be accurate or realized. These statements are not guarantees of future performance. Forward-looking statements also involve risks and uncertainties that are beyond Graphic Packaging's control. Additionally, there may be other risks and uncertainties that Graphic Packaging is unable to identify at this time or that Graphic Packaging does not currently expect to have a material impact on its business. Factors that could cause or contribute to these differences include the risks, uncertainties, and other factors discussed in our filings with the U.S. Securities and Exchange Commission (SEC), including in our Annual Report on Form 10-K for the year ended December 31,

2024 and other filings with the SEC. Undue reliance should not be placed on such forward-looking statements, as such statements speak only as of the date on which they are made and Graphic Packaging undertakes no obligation to revise or update such statements for any reason, except as may be required by law. Learn more at www.graphicpkg.com and in the Company's annual impact report at <https://www.graphicpkg.com/sustainability/sustainability-reporting/>.
[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/31/2024	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

(1.4.1) What is your organization’s annual revenue for the reporting period?

8807000000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?	How does your reporting boundary differ to that used in your financial statement?
	Select from: <input checked="" type="checkbox"/> No	We use the Operational Control boundary for our environmental reporting. The financial statements follow the financial control boundary condition.

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

US3886891015

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

3886891015

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

GPK

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

80-883-9062

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

- | | |
|--|--|
| <input checked="" type="checkbox"/> Spain | <input checked="" type="checkbox"/> Poland |
| <input checked="" type="checkbox"/> Brazil | <input checked="" type="checkbox"/> Sweden |
| <input checked="" type="checkbox"/> Canada | <input checked="" type="checkbox"/> Austria |
| <input checked="" type="checkbox"/> France | <input checked="" type="checkbox"/> Croatia |
| <input checked="" type="checkbox"/> Mexico | <input checked="" type="checkbox"/> Estonia |
| <input checked="" type="checkbox"/> Finland | <input checked="" type="checkbox"/> Indonesia |
| <input checked="" type="checkbox"/> Germany | <input checked="" type="checkbox"/> Netherlands |
| <input checked="" type="checkbox"/> Ireland | <input checked="" type="checkbox"/> New Zealand |
| <input checked="" type="checkbox"/> Nigeria | <input checked="" type="checkbox"/> Switzerland |
| <input checked="" type="checkbox"/> Australia | <input checked="" type="checkbox"/> United States of America |
| <input checked="" type="checkbox"/> United Kingdom of Great Britain and Northern Ireland | |

(1.8) Are you able to provide geolocation data for your facilities?

(1.8.1) Are you able to provide geolocation data for your facilities?

Select from:

☒ No, this is confidential data

(1.8.2) Comment

We do not provide this information. For a complete list of Graphic Packaging locations visit the Graphic Packaging website www.graphicpkg.com/locations or our 2024 Annual Report on Form 10-K.

[Fixed row]

(1.11) Are greenhouse gas emissions and/or water-related impacts from the production, processing/manufacturing, distribution activities or the consumption of your products relevant to your current CDP disclosure?

Production

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:

☒ Value chain (excluding own land)

(1.11.2) Primary reason emissions and/or water-related impacts from this activity are not relevant

Select from:

☒ Do not own/manage land

(1.11.3) Explain why emissions and/or water-related impacts from this activity are not relevant

The Company does not own / manage land. Additionally, in calculating our FLAG emissions footprint, we determined that FLAG emissions account for less than 1% of our total GHG emissions. This reflects our commitment to sustainably sourced forest products and minimization of deforestation risks in our supply chain.

Processing/ Manufacturing

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:

☒ Direct operations

Distribution

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:

- ☒ Both direct operations and upstream/downstream value chain

Consumption

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:

- ☒ Yes

[Fixed row]

(1.22) Provide details on the commodities that you produce and/or source.

Timber products

(1.22.1) Produced and/or sourced

Select from:

- ☒ Sourced

(1.22.2) Commodity value chain stage

Select all that apply

- ☒ Processing

- ☒ Manufacturing

(1.22.4) Indicate if you are providing the total commodity volume that is produced and/or sourced

Select from:

- ☒ Yes, we are providing the total volume

(1.22.5) Total commodity volume (metric tons)

10640019

(1.22.8) Did you convert the total commodity volume from another unit to metric tons?

Select from:

☒ No

(1.22.11) Form of commodity

Select all that apply

☒ Pulp

☒ Paper

☒ Hardwood logs

☒ Softwood logs

☒ Primary packaging

☒ Secondary packaging

☒ Wood-based bioenergy

☒ Sawn timber, veneer, chips

(1.22.12) % of procurement spend

Select from:

☒ 21-30%

(1.22.13) % of revenue dependent on commodity

Select from:

☒ 91-99%

(1.22.14) In the questionnaire setup did you indicate that you are disclosing on this commodity?

Select from:

☒ Yes, disclosing

(1.22.15) Is this commodity considered significant to your business in terms of revenue?

Select from:

☒ Yes

(1.22.19) Please explain

Graphic Packaging is a paperboard consumer packaging company, with 95% of the company's revenues dependent upon paperboard packaging manufactured using wood and wood fiber (timber products). The disclosed commodities include raw materials sourced to manufacture our consumer paperboard packaging. Graphic Packaging purchases locally grown sustainably produced softwood and hardwood, logs, pulp, and chips to service our paperboard manufacturing facilities in GA, LA, and TX. The wood-based paperboard manufactured by these paperboard manufacturing facilities is used in our global packaging plants to manufacture packaging products or may be sold in the external market. Bark and other wood residual materials are used to self-generate steam and electricity. The company also purchases recovered pre- and post-consumer fiber to service our recycle paperboard manufacturing facilities in MI, OH, and Quebec. The recycled fiber paperboard manufactured by these paperboard manufacturing facilities is used in our global packaging plants to manufacture packaging products or may be sold in the external market. Recovered fiber is included in our commodities listed here as we source pre- and post-consumer fiber from our own operations and through brokers and then recycle it into our products. The company also purchases forest-derived products both as raw materials to manufacture packaging and for use as secondary packaging to ship our products to customers.

[Fixed row]

(1.23) Which of the following agricultural commodities that your organization produces and/or sources are the most significant to your business by revenue?

Cotton

(1.23.1) Produced and/or sourced

Select from:

☒ No

Dairy & egg products

(1.23.1) Produced and/or sourced

Select from:

☒ No

Fish and seafood from aquaculture

(1.23.1) Produced and/or sourced

Select from:

☒ No

Fruit

(1.23.1) Produced and/or sourced

Select from:

☒ No

Maize/corn

(1.23.1) Produced and/or sourced

Select from:

☒ No

Nuts

(1.23.1) Produced and/or sourced

Select from:

☒ No

Other grain (e.g., barley, oats)

(1.23.1) Produced and/or sourced

Select from:

☒ No

Other oilseeds (e.g. rapeseed oil)

(1.23.1) Produced and/or sourced

Select from:

☒ No

Poultry & hog

(1.23.1) Produced and/or sourced

Select from:

☒ No

Rice

(1.23.1) Produced and/or sourced

Select from:

☒ No

Sugar

(1.23.1) Produced and/or sourced

Select from:

☒ No

Tea

(1.23.1) Produced and/or sourced

Select from:

☒ No

Tobacco

(1.23.1) Produced and/or sourced

Select from:

☒ No

Vegetable

(1.23.1) Produced and/or sourced

Select from:

☒ No

Wheat

(1.23.1) Produced and/or sourced

Select from:

☒ No

Other commodity

(1.23.1) Produced and/or sourced

Select from:

☒ No

[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

☒ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

- ☒ Upstream value chain
- ☒ Downstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

- ☒ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

- ☒ Tier 2 suppliers

(1.24.6) Smallholder inclusion in mapping

Select from:

- ☒ Smallholders relevant but not included

(1.24.7) Description of mapping process and coverage

Mapping process uses spend with direct suppliers and revenues from customers to map the upstream and downstream value chain. Coverage includes spend with all direct suppliers and revenues from all customers in the countries where we operate.

[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

- ☒ Yes, we have mapped or are currently in the process of mapping plastics in our value chain

(1.24.1.2) Value chain stages covered in mapping

Select all that apply

- ☒ Upstream value chain
- ☒ Downstream value chain
- ☒ End-of-life management

(1.24.1.4) End-of-life management pathways mapped

Select all that apply

- ☒ Recycling
- ☒ Landfill

[Fixed row]

(1.24.2) Which commodities has your organization mapped in your upstream value chain (i.e., supply chain)?

Timber products

(1.24.2.1) Value chain mapped for this sourced commodity

Select from:

- ☒ Yes

(1.24.2.2) Highest supplier tier mapped for this sourced commodity

Select from:

- ☒ Tier 1 suppliers

(1.24.2.3) % of tier 1 suppliers mapped

Select from:

- ☒ 100%

(1.24.2.7) Highest supplier tier known but not mapped for this sourced commodity

Select from:

☒ Tier 2 suppliers

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

1

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Graphic Packaging has adopted an annual work execution cycle. Company performance objectives, budget targets, individual employee goals, risk management objectives, R&D goals, etc. are tracked and reported on an annual basis. Decisions regarding climate-related or other environmental risks and opportunities are made in real time as risks are identified and are assessed as the business requires. Management is responsible for identifying, mitigating, and managing risks across the organization. Risks or opportunities are identified using a variety of methods and tools.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

3

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Graphic Packaging follows a three-year planning horizon in developing investor commitments, R&D priorities, risk/opportunity assessments, budget and resource allocations, etc. We align our business processes to the three-year plan to drive execution and deliver business results. Climate related and other environmental risks and opportunities are identified, assessed, and planned for through four distinct processes: during the annual enterprise strategic risk assessment process, the annual sustainability issue assessment process (a.k.a. sustainability materiality assessment), a stand-alone climate scenario analysis, and then during development of the long-range strategic business plan for the 1 – 3 year forward outlook. Any identified material risk or opportunity is incorporated in the plans, including mitigation and monitoring strategies, planning and budgeting, and continued risk reporting, as appropriate.

Long-term

(2.1.1) From (years)

3

(2.1.2) Is your long-term time horizon open ended?

Select from:

☒ Yes

(2.1.4) How this time horizon is linked to strategic and/or financial planning

As part of our long-range strategic planning, any risks or opportunities that may be identified that are longer than 3 years will be assessed, including climate-related risks identified during the climate scenario analysis process. Longer term risk management or business opportunity strategies may be developed for specific capital investments for long-lived assets, valuable intellectual property, or specific environmental, social, or governance topics due to the time scale for these issue areas. All major investment decisions, portfolio reviews, acquisitions and divestitures are reviewed in the light of long-term trends, opportunities and threats. Those reviews consider the evolution of global trends in regulations, climate change, energy and raw material markets, water and other natural resource availability, and consumer demands.

[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☒ Climate change

☒ Forests

- ☒ Water
- ☒ Biodiversity

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

- ☒ Dependencies
- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain
- ☒ Downstream value chain
- ☒ End of life management

(2.2.2.4) Coverage

Select from:

- ☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

- ☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

- ☒ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- ☒ Site-specific
- ☒ Local
- ☒ Sub-national
- ☒ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- ☒ EcoVadis
- ☒ SEDEX
- ☒ WRI Aqueduct

☒ Other commercially/publicly available tools, please specify :FSC US National Risk Assessment, Ecoact Climate Modeling Tool (ECLR), Environmental Performance Index (EPI)

Enterprise Risk Management

☒ COSO Enterprise Risk Management Framework

☒ Enterprise Risk Management

☒ Internal company methods

☒ Risk models

International methodologies and standards

☒ IPCC Climate Change Projections

Databases

☒ Nation-specific databases, tools, or standards

☒ Other databases, please specify :Audit Board Risk Oversight, Dow Jones (supplier human rights), OneTrust, SOVOS, NatureServe Explorer Pro, US Forest Service FIA EVALIDator; Key Biodiversity Areas (KBAs) Database, Alliance for Zero Extinction (AZE); Transparency Intl, Worldwide Gov I

Other

☒ Desk-based research

☒ External consultants

☒ Materiality assessment

☒ Scenario analysis

☒ Other, please specify :internal tool built to manage areas such as German supply chain compliance

(2.2.2.13) Risk types and criteria considered

Acute physical

☒ Drought

☒ Tornado

☒ Wildfires

☒ Heat waves

☒ Toxic spills

☒ Cold wave/frost

☒ Cyclones, hurricanes, typhoons

☒ Heavy precipitation (rain, hail, snow/ice)

☒ Flood (coastal, fluvial, pluvial, ground water)

☒ Storm (including blizzards, dust, and sandstorms)

Chronic physical

- ☑ Heat stress
- ☑ Water stress
- ☑ Change in land-use
- ☑ Groundwater depletion
- ☑ Temperature variability
- ☑ Water availability at a basin/catchment level
- ☑ Seasonal supply variability/interannual variability
- ☑ Changing temperature (air, freshwater, marine water)
- ☑ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy

- ☑ Carbon pricing mechanisms
- ☑ Changes to national legislation
- ☑ Regulation of discharge quality/volumes
- ☑ Poor coordination between regulatory bodies
- provinces.**
- ☑ Increased difficulty in obtaining operations permits

Market

- ☑ Leakage markets
- ☑ Changing customer behavior
- ☑ Uncertainty in the market signals
- ☑ Uncertainty about commodity origin and/or legality
- ☑ Availability and/or increased cost of raw materials

Reputation

- ☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback
- ☑ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

- ☑ Declining ecosystem services
- ☑ Increased ecosystem vulnerability
- ☑ Rationing of municipal water supply
- ☑ Precipitation or hydrological variability
- ☑ Increased severity of extreme weather events

- ☑ Changes to international law and bilateral agreements
- ☑ Mandatory water efficiency, conservation, recycling, or process standards
- ☑ Introduction of regulatory standards for previously unregulated contaminants
- ☑ Other policy, please specify :**inconsistent policy between states and**

- ☑ Availability and/or increased cost of certified sustainable material

Technology

- ☒ Data access/availability or monitoring systems
- ☒ Transition to lower emissions technology and products
- ☒ Transition to water efficient and low water intensity technologies and products
- ☒ Unsuccessful investment in new technologies
- ☒ Other technology, please specify :Transition to reusable products, transition to increasing recycled content, transition to increasing renewable content

Liability

- ☒ Exposure to litigation
- ☒ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- | | |
|--|--|
| <input checked="" type="checkbox"/> Customers | <input checked="" type="checkbox"/> Local communities |
| <input checked="" type="checkbox"/> Employees | <input checked="" type="checkbox"/> Water utilities at a local level |
| <input checked="" type="checkbox"/> Investors | <input checked="" type="checkbox"/> Other commodity users/producers at a local level |
| <input checked="" type="checkbox"/> Suppliers | |
| <input checked="" type="checkbox"/> Regulators | |

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

- ☒ Yes

(2.2.2.16) Further details of process

Graphic Packaging uses a comprehensive Enterprise Risk Management (ERM) system with a formal governance process and defined expectations regarding risk management and oversight. It assures effective, systematic identification, analysis, prioritization, and management of risks that have the potential to affect our company on a short-, medium-, and long-term basis and provides necessary input to inform our strategic planning and business improvement goals. Major impacts, risks and opportunities (IROs) are defined as those that could have a substantive financial or reputational impact on the company. The corporate risk management (CRM) team conducts an annual risk analysis process to validate existing, known risks and identify new and emerging IROs facing the Company – including IROs related to climate change, water, and forests. The IRO analysis process considers input from the Board, executive leadership team (ELT), business and function

leaders and inputs collected through the strategy, budget, ESG issue prioritization processes, and climate risk scenario analyses. Potential IROs may also be identified through external inputs such as professional and trade business associations, professional services firms, industry alerts, government agency communications, the Company Alert line and various conferences or industry round tables. Active programs are also in place to monitor the Company's customer base and end-consumer sentiment to identify potential downstream IROs. Each risk is reviewed, evaluated, and prioritized using a scaled, weighted approach that considers the potential likelihood the risk will occur, speed of impact, and degree of potential impact. Potential impacts evaluated include those related to our direct operations (e.g., financial impacts, threats to our right to operate, Company reputational damage, environment or community impact, etc.) as well as possible impacts to our supply chain continuity, ability to meet customer commitments, or impacts to our customers' operations. This prioritization is conducted by internal subject matter experts working with the ERM team. The resulting prioritized risk inventory is reviewed with the ELT, and then the Board. Any significant new or emerging risks that arise throughout the year are analyzed, prioritized, and added to the risk management process. The Board oversees the ERM process, receives various management and board committee reports, and engages in periodic discussions with the company's officers, as it may deem appropriate. Specifically, the Board Audit Committee oversees the policies and practices that govern the processes to identify, assess, manage and control IROs. Responsibility for managing risk rests with the CEO and ELT. Company function or business leaders are appointed as risk owners and sponsors for each major risk. Risk mitigation plans are developed and implemented by the risk owner with support from their respective team and risk sponsor. The risk owner develops and monitors key risk indicators to track progress managing the risk and determine if intervention or corrective action is needed. The risk management progress is periodically communicated to the ELT, with a formal, annual review with the Board of Directors and the Audit Committee. Additionally, all risks are reviewed and reassessed on at least a semi-annual basis to identify changes in the internal or external environment which may cause certain risks to recede or others to appear.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☒ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☒ Impacts

☒ Risks

☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☒ Direct operations

- ☒ Upstream value chain
- ☒ Downstream value chain
- ☒ End of life management

(2.2.2.4) Coverage

Select from:

- ☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

- ☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ Every three years or more

(2.2.2.9) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

- ☒ A specific environmental risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- ☒ Site-specific
- ☒ Local
- ☒ Sub-national
- ☒ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- ☒ Other commercially/publicly available tools, please specify :EcoAct Climate Modeling Tool (ECLR)

Enterprise Risk Management

- ☒ Enterprise Risk Management
- ☒ Internal company methods
- ☒ Risk models

International methodologies and standards

- ☒ IPCC Climate Change Projections

Databases

- ☒ Other databases, please specify :IEA World Energy Outlook, IPCC Accompanying Shared Socioeconomic Platforms (SSPs)

Other

- ☒ Desk-based research
- ☒ External consultants
- ☒ Materiality assessment
- ☒ Partner and stakeholder consultation/analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- ☒ Drought
- ☒ Tornado
- ☒ Avalanche
- ☒ Landslide
- ☒ Wildfires
- ☒ Heavy precipitation (rain, hail, snow/ice)
- ☒ Flood (coastal, fluvial, pluvial, ground water)
- ☒ Storm (including blizzards, dust, and sandstorms)
- ☒ Heat waves
- ☒ Subsidence
- ☒ Cold wave/frost
- ☒ Glacial lake outburst
- ☒ Cyclones, hurricanes, typhoons

Chronic physical

- ☒ Heat stress
- ☒ Soil erosion
- ☒ Solifluction
- ☒ Water stress
- ☒ Sea level rise
- ☒ Temperature variability
- ☒ Precipitation or hydrological variability
- ☒ Increased severity of extreme weather events
- ☒ Changing temperature (air, freshwater, marine water)
- ☒ Changing precipitation patterns and types (rain, hail, snow/ice)
- ☒ Coastal erosion
- ☒ Soil degradation
- ☒ Permafrost thawing
- ☒ Ocean acidification
- ☒ Changing wind patterns

Policy

- ☒ Carbon pricing mechanisms
- ☒ Changes to international law and bilateral agreements
- ☒ Changes to national legislation

Market

- ☒ Availability and/or increased cost of raw materials

- ☒ Changing customer behavior
- ☒ Uncertainty in the market signals

Reputation

- ☒ Increased partner and stakeholder concern and partner and stakeholder negative feedback
- ☒ Stigmatization of sector
- ☒ Other reputation, please specify :Shifts in consumer preferences

Technology

- ☒ Transition to lower emissions technology and products
- ☒ Unsuccessful investment in new technologies
- ☒ Other technology, please specify :Substitution of existing products and services with lower emissions options

Liability

- ☒ Exposure to litigation
- ☒ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- ☒ Customers
- ☒ Employees
- ☒ Investors
- ☒ Regulators
- ☒ Suppliers

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

- ☒ Yes

(2.2.2.16) Further details of process

This year, Graphic Packaging also employed a climate scenario analysis to identify, prioritize, and assess climate-related risks and opportunities. The process started by reviewing climate risks disclosed by industry peers and engaging stakeholders from across the business to gather their input and observations of climate-related transition and physical risk impacts. Once an exhaustive list of risks was identified, Graphic Packaging then engaged stakeholders to prioritize the risks based on likelihood, severity, and velocity – aligning with our ERM processes. Physical risks were modelled using a third-party proprietary Climate Modelling tool to measure site-level hazard exposure to 28 different acute and chronic physical hazards based on IPCC climate change projections. The analysis focused on short- to medium-term (2030) impacts but included projections out to 2050 and 2100. Transition risks were considered in the context of scenarios from the IEA and IPCC. Following this technical analysis, Graphic Packaging is now engaging sites to establish appropriate risk mitigation and adaptation measures; while results are also being integrated into our ERM and strategic planning processes.

[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

	Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed	Description of how interconnections are assessed
	Select from: <input checked="" type="checkbox"/> Yes	Interconnections are assessed as part of the ERM process.

[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☒ Yes, we have identified priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☒ Direct operations

☒ Upstream value chain

(2.3.3) Types of priority locations identified

Sensitive locations

- ☑ Areas important for biodiversity
- ☑ Areas of high ecosystem integrity
- ☑ Areas of limited water availability, flooding, and/or poor quality of water

Locations with substantive dependencies, impacts, risks, and/or opportunities

- ☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to forests
- ☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to water
- ☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to biodiversity

(2.3.4) Description of process to identify priority locations

Climate: We regularly assess our direct operations locations and selected supplier locations for potential climate-related physical risks. When evaluating risks, we consider the potential likelihood the risk will occur, speed of impact, and degree of potential impact. Potential impacts include disruptions to our direct operations and impacts to our supply chain continuity. Property and other insurance levels are considered when determining degree of potential impact. Water: Annually, we use the WRI Aqueduct tool to assess water-related risks in our direct operations. Facility locations are input into the tool, which then models current water stress and depletion, and future water stress into 2030 and 2040. Facilities with predicted high or extremely high water stress are evaluated by assessing water needs and potential impact on our operations. Currently, water withdrawals from facilities in water stressed areas represent 0.25% of our total water withdrawals and access to water is not a significant risk. Forestry: Graphic Packaging undertakes rigorous, multifaceted, forest related risk identification processes every year. We conduct a risk assessment of our supply areas per certification requirements under FSC, SFI and PEFC standards. To identify risks, we leverage the FSC, SFI and PEFC definitions for high conservation values (HCVs). The Company draws on the FSC National Risk Assessment, and other resources, including credible, publicly available data and expert consultants in the arena of forests, sustainability, climate, governance, and other factors. We also use the USDA Forest Service's Forest Inventory and Analysis (FIA) data for counties in our US wood supply basin to detect forest loss trends. We review the results of these assessments and incorporate them into our sourcing, purchasing, contracting and supplier engagement practices. We also review external board and packaging purchases to evaluate risks in support of our commitment to avoid controversial sources and promote supply chain transparency. Biodiversity Analysis: We identify areas with high biodiversity value using several key tools. The FSC US National Risk Assessment (NRA) identifies critical biodiversity areas (CBAs) and species associated with high conservation values that are most vulnerable to impacts from forest harvesting. We leverage mapping done by the Key Biodiversity Areas network and Alliance for Zero Extinction, collaborative initiatives of biodiversity conservation organizations from around the world working to prevent extinctions by promoting identification and ensuring the safeguard and effective conservation of key sites. Lastly, we use the NatureServe Explorer Pro tool which has mapped habitats and known occurrences of critically imperiled and imperiled species. Using these results and support from subject matter expert consultants, we developed a set of management considerations to promote the conservation of these species and their habitats.

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☒ No, we have a list/geospatial map of priority locations, but we will not be disclosing it

[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☒ Qualitative

☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☒ Other, please specify :risk ranking from ERM process that considers impact, frequency, speed of onset, and likelihood, as well as financial / non-financial measures such as revenue, operating income, market share, reputation, regulatory limitations, key alliances

(2.4.3) Change to indicator

Select from:

☒ Absolute increase

(2.4.5) Absolute increase/ decrease figure

10

(2.4.6) Metrics considered in definition

Select all that apply

☒ Frequency of effect occurring

☒ Time horizon over which the effect occurs

- ☒ Likelihood of effect occurring

(2.4.7) Application of definition

Substantive effects are events that could impact our business and require management attention to either mitigate risk or capitalize on new opportunities (R/Os). To identify and rank substantive effects we consider both qualitative and quantitative measures. Quantitative measures include potential impacts to revenue, earnings and assets. Qualitative measures include but are not limited to impacts to employee/community safety, regulatory requirements, our reputation, business continuity, trends in the underlying business, and suppliers and customers. Substantive impacts would include those that would have a high likelihood to result in a loss of key suppliers or customers, sustained serious loss in market share or Company value, death, serious breaches of legal and regulatory compliance, litigation, impact to future operations, customer market disintegration, significant impact on shareholders, catastrophic business continuity exposure, and financial losses/opportunities. Considered effects include those related to our operations, supply chain, ability to meet customer commitments, and consumers. Factors are weighed against: (a) The proportion of business units affected; (b) The size of impact on those business units or facilities, and (c) The potential for external stakeholder concern. A potential substantive effect could occur due to a large change in one of these aspects or small changes in multiple aspects combining to create a larger impact. But, magnitude of the issue, by itself, without regard to the nature of the R/O and the circumstances, will not generally be a sufficient basis for the judgment. The Company considers qualitative and quantitative factors together when evaluating whether a specific R/O would have a substantive effect. A quantitative score is assigned to each R/O as follows: a magnitude factor of 1-5 (1 being low financial impact and 5 being high impact), and a risk probability factor of 1-5 (1 corresponding to a risk that rarely occurs within four years and 5 corresponding to a risk that is almost certain to occur within two-years). When magnitude multiplied by probability is equal to or greater than 10, the R/O is considered to have a potential substantive effect. The velocity or speed of R/O onset is also considered to assess reaction times and mitigation planning.

Opportunities

(2.4.1) Type of definition

Select all that apply

- ☒ Qualitative
- ☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

- ☒ Other, please specify :risk ranking from ERM process that considers impact, frequency, speed of onset, and likelihood, as well as financial / non-financial measures such as revenue, operating income, market share, reputation, regulatory limitations, key alliances

(2.4.3) Change to indicator

Select from:

☒ Absolute increase

(2.4.5) Absolute increase/ decrease figure

10

(2.4.6) Metrics considered in definition

Select all that apply

☒ Frequency of effect occurring

☒ Time horizon over which the effect occurs

☒ Likelihood of effect occurring

(2.4.7) Application of definition

Substantive effects are events that could impact our business and require management attention to either mitigate risk or capitalize on new opportunities (R/Os). To identify and rank substantive effects we consider both qualitative and quantitative measures. Quantitative measures include potential impacts to revenue, earnings and assets. Qualitative measures include but are not limited to impacts to employee/community safety, regulatory requirements, our reputation, business continuity, trends in the underlying business, and suppliers and customers. Substantive impacts would include those that would have a high likelihood to result in a loss of key suppliers or customers, sustained serious loss in market share or Company value, death, serious breaches of legal and regulatory compliance, litigation, impact to future operations, customer market disintegration, significant impact on shareholders, catastrophic business continuity exposure, and financial losses/opportunities. Considered effects include those related to our operations, supply chain, ability to meet customer commitments, and consumers. Factors are weighed against: (a) The proportion of business units affected; (b) The size of impact on those business units or facilities, and (c) The potential for external stakeholder concern. A potential substantive effect could occur due to a large change in one of these aspects or small changes in multiple aspects combining to create a larger impact. But, magnitude of the issue, by itself, without regard to the nature of the R/O and the circumstances, will not generally be a sufficient basis for the judgment. The Company considers qualitative and quantitative factors together when evaluating whether a specific R/O would have a substantive effect. A quantitative score is assigned to each R/O as follows: a magnitude factor of 1-5 (1 being low financial impact and 5 being high impact), and a risk probability factor of 1-5 (1 corresponding to a risk that rarely occurs within four years and 5 corresponding to a risk that is almost certain to occur within two-years). When magnitude multiplied by probability is equal to or greater than 10, the R/O is considered to have a potential substantive effect. The velocity or speed of R/O onset is also considered to assess reaction times and mitigation planning.

[Add row]

(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

(2.5.1) Identification and classification of potential water pollutants

Select from:

☒ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

Global environmental regulations and local discharge permits strictly govern discharged effluent water quality at our paperboard manufacturing and packaging facilities and set discharge parameters through the permitting process. The controls imposed by these government-issued permits contain monitored parameters and limits that are specific to each location, based on the profile of the receiving water body.

[Fixed row]

(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Row 1

(2.5.1.1) Water pollutant category

Select from:

☒ Nitrates

(2.5.1.2) Description of water pollutant and potential impacts

Tracking of water pollutants at each of our facilities varies somewhat based on what is required to be monitored and managed under each facility's government-issued permit. Examples of the type of pollutants tracked may include Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), adsorbable organic halides (AOX), ammonia- nitrogen, dioxin, pH, phosphorus, aluminum, and dissolved oxygen concentration. Our waste water treatment systems at our paperboard manufacturing facilities are primarily designed for reduction in suspended solids (TSS) and BOD removal by biological treatment. Potential impacts are: Higher BOD levels could reduce receiving waters oxygen availability, degrade aquatic habitats and impair water use. High TSS levels may decrease receiving waters natural dissolved oxygen levels and increase water temperature in surface water systems. High levels of adsorbable organic halides and dioxin may impact environmental receptors and human health. Ammonia can be toxic to aquatic life at elevated concentrations and can accumulate in water bodies to produce algae blooms, which deplete oxygen concentrations in the water as the algae dies.

(2.5.1.3) Value chain stage

Select all that apply

- ☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- ☒ Water recycling
- ☒ Resource recovery
- ☒ Upgrading of process equipment/methods
- ☒ Reduction or phase out of hazardous substances
- ☒ Requirement for suppliers to comply with regulatory requirements
- ☒ Industrial and chemical accidents prevention, preparedness, and response
- ☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- ☒ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience
- ☒ Other, please specify :Real time monitoring of pollutant indicators, Pre-permit analysis and modeling approved by the authoritative agency to ensure discharge limits ensure no adverse impacts to the environment

(2.5.1.5) Please explain

Our facilities focus on managing the quality of the water discharged to the environment. Our approach to managing water quality starts with complying with local laws and regulations and adhering to discharge permit requirements governing specific effluent water quality criteria set to protect local water resources. Next, we focus our efforts on protection, working to prevent future impacts to water quality by maintaining our facilities to protect against leaks or uncontrolled releases to the environment. Our facilities identify potential locations within the facility where spills or leaks of materials may cause impacts to water resources, develop preventive measures. Comprehensive spill response plans outline actions to mitigate releases and prevent materials from reaching nearby water bodies.

Row 2

(2.5.1.1) Water pollutant category

Select from:

- ☒ Inorganic pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Tracking of water pollutants at each of our facilities varies somewhat based on what is required to be monitored and managed under each facility's government-issued permit. Examples of the type of pollutants tracked may include Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), adsorbable organic halides (AOX), ammonia- nitrogen, dioxin, pH, phosphorus, aluminum, and dissolved oxygen concentration. Our waste water treatment systems at our paperboard manufacturing facilities are primarily designed for reduction in suspended solids (TSS) and BOD removal by biological treatment. Potential impacts are: Higher BOD levels could reduce receiving waters oxygen availability, degrade aquatic habitats and impair water use. High TSS levels may decrease receiving waters natural dissolved oxygen levels and increase water temperature in surface water systems. High levels of adsorbable organic halides and dioxin may impact environmental receptors and human health. Ammonia can be toxic to aquatic life at elevated concentrations and can accumulate in water bodies to produce algae blooms, which deplete oxygen concentrations in the water as the algae dies.

(2.5.1.3) Value chain stage

Select all that apply

- ☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- ☒ Water recycling
- ☒ Resource recovery
- ☒ Upgrading of process equipment/methods
- ☒ Reduction or phase out of hazardous substances
- ☒ Requirement for suppliers to comply with regulatory requirements
- ☒ Industrial and chemical accidents prevention, preparedness, and response
- ☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- ☒ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience
- ☒ Other, please specify :Real time monitoring of pollutant indicators, Pre-permit analysis and modeling approved by the authoritative agency to ensure discharge limits ensure no adverse impacts to the environment

(2.5.1.5) Please explain

Our facilities focus on managing the quality of the water discharged to the environment. Our approach to managing water quality starts with complying with local laws and regulations and adhering to discharge permit requirements governing specific effluent water quality criteria set to protect local water resources. Next, we focus our efforts on protection, working to prevent future impacts to water quality by maintaining our facilities to protect against leaks or uncontrolled releases to the

environment. Our facilities identify potential locations within the facility where spills or leaks of materials may cause impacts to water resources, develop preventive measures. Comprehensive spill response plans outline actions to mitigate releases and prevent materials from reaching nearby water bodies.

Row 3

(2.5.1.1) Water pollutant category

Select from:

☒ Phosphates

(2.5.1.2) Description of water pollutant and potential impacts

Tracking of water pollutants at each of our facilities varies somewhat based on what is required to be monitored and managed under each facility's government-issued permit. Examples of the type of pollutants tracked may include Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), adsorbable organic halides (AOX), ammonia- nitrogen, dioxin, pH, phosphorus, aluminum, and dissolved oxygen concentration. Our waste water treatment systems at our paperboard manufacturing facilities are primarily designed for reduction in suspended solids (TSS) and BOD removal by biological treatment. Potential impacts are: Higher BOD levels could reduce receiving waters oxygen availability, degrade aquatic habitats and impair water use. High TSS levels may decrease receiving waters natural dissolved oxygen levels and increase water temperature in surface water systems. High levels of adsorbable organic halides and dioxin may impact environmental receptors and human health. Ammonia can be toxic to aquatic life at elevated concentrations and can accumulate in water bodies to produce algae blooms, which deplete oxygen concentrations in the water as the algae dies.

(2.5.1.3) Value chain stage

Select all that apply

☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☒ Water recycling

☒ Resource recovery

☒ Upgrading of process equipment/methods

☒ Reduction or phase out of hazardous substances

☒ Requirement for suppliers to comply with regulatory requirements

☒ Industrial and chemical accidents prevention, preparedness, and response

- ☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- ☒ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience
- ☒ Other, please specify :Real time monitoring of pollutant indicators, Pre-permit analysis and modeling approved by the authoritative agency to ensure discharge limits ensure no adverse impacts to the environment

(2.5.1.5) Please explain

Our facilities focus on managing the quality of the water discharged to the environment. Our approach to managing water quality starts with complying with local laws and regulations and adhering to discharge permit requirements governing specific effluent water quality criteria set to protect local water resources. Next, we focus our efforts on protection, working to prevent future impacts to water quality by maintaining our facilities to protect against leaks or uncontrolled releases to the environment. Our facilities identify potential locations within the facility where spills or leaks of materials may cause impacts to water resources, develop preventive measures. Comprehensive spill response plans outline actions to mitigate releases and prevent materials from reaching nearby water bodies.

Row 4

(2.5.1.1) Water pollutant category

Select from:

- ☒ Other nutrients and oxygen demanding pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Tracking of water pollutants at each of our facilities varies somewhat based on what is required to be monitored and managed under each facility's government-issued permit. Examples of the type of pollutants tracked may include Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), adsorbable organic halides (AOX), ammonia- nitrogen, dioxin, pH, phosphorus, aluminum, and dissolved oxygen concentration. Our waste water treatment systems at our paperboard manufacturing facilities are primarily designed for reduction in suspended solids (TSS) and BOD removal by biological treatment. Potential impacts are: Higher BOD levels could reduce receiving waters oxygen availability, degrade aquatic habitats and impair water use. High TSS levels may decrease receiving waters natural dissolved oxygen levels and increase water temperature in surface water systems. High levels of adsorbable organic halides and dioxin may impact environmental receptors and human health. Ammonia can be toxic to aquatic life at elevated concentrations and can accumulate in water bodies to produce algae blooms, which deplete oxygen concentrations in the water as the algae dies.

(2.5.1.3) Value chain stage

Select all that apply

- ☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- ☒ Water recycling
- ☒ Resource recovery
- ☒ Upgrading of process equipment/methods
- ☒ Reduction or phase out of hazardous substances
- ☒ Requirement for suppliers to comply with regulatory requirements
- ☒ Industrial and chemical accidents prevention, preparedness, and response
- ☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- ☒ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience
- ☒ Other, please specify :Real time monitoring of pollutant indicators, Pre-permit analysis and modeling approved by the authoritative agency to ensure discharge limits ensure no adverse impacts to the environment

(2.5.1.5) Please explain

Our facilities focus on managing the quality of the water discharged to the environment. Our approach to managing water quality starts with complying with local laws and regulations and adhering to discharge permit requirements governing specific effluent water quality criteria set to protect local water resources. Next, we focus our efforts on protection, working to prevent future impacts to water quality by maintaining our facilities to protect against leaks or uncontrolled releases to the environment. Our facilities identify potential locations within the facility where spills or leaks of materials may cause impacts to water resources, develop preventive measures. Comprehensive spill response plans outline actions to mitigate releases and prevent materials from reaching nearby water bodies.

Row 5

(2.5.1.1) Water pollutant category

Select from:

- ☒ Other physical pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Tracking of water pollutants at each of our facilities varies somewhat based on what is required to be monitored and managed under each facility's government-issued permit. Examples of the type of pollutants tracked may include Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), adsorbable organic halides (AOX), ammonia- nitrogen, dioxin, pH, phosphorus, aluminum, and dissolved oxygen concentration. Our waste water treatment systems at our paperboard

manufacturing facilities are primarily designed for reduction in suspended solids (TSS) and BOD removal by biological treatment. Potential impacts are: Higher BOD levels could reduce receiving waters oxygen availability, degrade aquatic habitats and impair water use. High TSS levels may decrease receiving waters natural dissolved oxygen levels and increase water temperature in surface water systems. High levels of adsorbable organic halides and dioxin may impact environmental receptors and human health. Ammonia can be toxic to aquatic life at elevated concentrations and can accumulate in water bodies to produce algae blooms, which deplete oxygen concentrations in the water as the algae dies.

(2.5.1.3) Value chain stage

Select all that apply

- ☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- ☒ Water recycling
- ☒ Resource recovery
- ☒ Upgrading of process equipment/methods
- ☒ Reduction or phase out of hazardous substances
- ☒ Requirement for suppliers to comply with regulatory requirements
- ☒ Industrial and chemical accidents prevention, preparedness, and response
- ☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- ☒ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience
- ☒ Other, please specify :Real time monitoring of pollutant indicators, Pre-permit analysis and modeling approved by the authoritative agency to ensure discharge limits ensure no adverse impacts to the environment

(2.5.1.5) Please explain

Our facilities focus on managing the quality of the water discharged to the environment. Our approach to managing water quality starts with complying with local laws and regulations and adhering to discharge permit requirements governing specific effluent water quality criteria set to protect local water resources. Next, we focus our efforts on protection, working to prevent future impacts to water quality by maintaining our facilities to protect against leaks or uncontrolled releases to the environment. Our facilities identify potential locations within the facility where spills or leaks of materials may cause impacts to water resources, develop preventive measures. Comprehensive spill response plans outline actions to mitigate releases and prevent materials from reaching nearby water bodies.

[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☒ Yes, both in direct operations and upstream/downstream value chain

Forests

(3.1.1) Environmental risks identified

Select from:

☒ Yes, both in direct operations and upstream/downstream value chain

Water

(3.1.1) Environmental risks identified

Select from:

☒ Yes, only within our direct operations

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

Annually, the Company uses the WRI Aqueduct Water Risk Atlas to assess water-related risks such as water quality, quantity, and regulation, etc. in its direct operations. Facility locations are input into the tool, which then models current water stress and depletion, and future water stress into 2030 and 2040. These resulting risks are assessed and prioritized, and the outcomes are reported to the Chief Sustainability Officer (CSO). These tools are also useful when screening locations for new facility investments to ensure adequate water supply will be available during the operating life of the facility. Water-related supply chain risks are included in Graphic Packaging's climate change risk assessment. The outcome of this assessment informs Graphic Packaging if supply chain risks exist. Water availability and water quality at the basin level, and by extension the implications of water on our key raw materials, are considered because the Company relies on tree growth to produce fiber, which is a critical component of our manufacturing process. Access to safe drinking-water, sanitation and hygiene (WASH) services is critical to the health and safety of our employees, and Graphic Packaging ensures that this is maintained through annual audits and adherence to local regulations. Based on Graphic Packaging's methodology for assessing substantive financial or strategic impact, the individual sites identified by the WRI Aqueduct tool as located in basins with high/extremely high risk do not currently meet the Company's threshold for substantive impact. Greater than 99.5% of the water we rely upon is sourced from water rich watersheds. For those facilities located in stressed watersheds, we have confirmed we have access to the water we need to maintain normal business operations.

Plastics

(3.1.1) Environmental risks identified

Select from:

☒ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Not an immediate strategic priority

(3.1.3) Please explain

Graphic Packaging only uses trace amounts of plastic in its operations. Plastic packaging products represent ~3% of our revenues (with 95% of revenues from fiber-based materials) and do not currently meet the Company's threshold for presenting a substantive environmental impact. Additionally, Graphic Packaging is constantly working to innovate better packaging alternatives to replace existing plastic options with paperboard alternatives, and to find renewable alternatives for virgin fossil-based plastic content in our products, such as using bio-based polylactic acid coatings to replace LDPE coating in our cups.

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Flooding (coastal, fluvial, pluvial, groundwater)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Spain

☒ Brazil

☒ Canada

☒ France

☒ Mexico

☒ Australia

☒ Indonesia

☒ Netherlands

☒ New Zealand

☒ Poland

☒ Sweden

☒ Croatia

☒ Germany

☒ Nigeria

☒ United States of America

☒ United Kingdom of Great Britain and Northern Ireland

☒ Switzerland

(3.1.1.9) Organization-specific description of risk

Graphic Packaging's operations face physical risks related to extreme weather events and increased flooding. As the severity and/or frequency of extreme weather events increases, this could impact our operations by causing one or more of our facilities to become inoperable resulting in a direct impact on our production, sales, and/or costs. Many of our operating sites are located near rivers, and the risk of flooding may increase due to surface water flooding following extreme rainfall or rapid snow melting events. For example, sites located in Louisiana, Missouri, and Pennsylvania have all experienced acute flooding events in recent years, which has caused property damages and production disruptions. We also assessed coastal flooding risk using the EcoAct Climate Risk Platform (ECLR).

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Short-term

☒ Medium-term

☒ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ About as likely as not

(3.1.1.14) Magnitude

Select from:

☒ Low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Anticipated effect is similar across all potential time horizons. In the event a severe weather event disrupts activities at a specific location, the company may experience temporary disruption in business activities and increased costs at that location while the facility undergoes maintenance/repairs to recover from the extreme weather event. Cost impacts may also include losses for damage to inventory materials. Customer orders may be delayed either due to facility downtime during repairs or delays transferring the orders to other facilities for fulfillment.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

(3.1.1.26) Primary response to risk

Policies and plans

☒ Increase insurance coverage

(3.1.1.28) Explanation of cost calculation

We do not disclose this information.

(3.1.1.29) Description of response

We take action to prepare locations to minimize financial impact and maintain business continuity during extreme weather events. Crisis management procedures ensure personnel understand what to do to respond during a weather-related emergency. Multiple sites are qualified to produce the same products, providing manufacturing redundancy to ensure business continuity and customer orders are met should a location become inoperable. Insurance policies are in place to mitigate potential financial loss or damage. We manage this risk via our ERM process control plan. The risk owner ensures insurance is in place and adequate coverage levels are maintained. We perform an annual insurance review that is reported to the Audit Committee and purchase additional flood insurance coverage as needed for our facilities. Proactive site protection actions have been taken to minimize potential flood-related impacts to facilities and inventory, including purchasing temporary barriers (AquaDams) to deploy and create an artificial levee/dam around a facility to prevent floodwater intrusion. Pumps are also stored and ready when needed to reduce the impact of rising flood water. Reliability experts and maintenance personnel are trained and ready to respond, while critical parts are maintained in inventory to ensure production is restored as quickly as possible. Back-up plans are in place in the event resources cannot get to the worksite. In recent years, several of Graphic Packaging's plants have experienced a flood event. Each event was addressed effectively via redundant capacity planning and proactive measures where possible. The most recent flooding event occurred in 2021 at Phoenixville, PA and caused significant damage to the site, requiring us to repair and/or replace production equipment and redirect resources from other packaging locations. We are investigating flood mitigation measures for this location and monitoring annually through our risk management program.

Forests

(3.1.1.1) Risk identifier

Select from:

☒ Risk1

(3.1.1.2) Commodity

Select all that apply

☒ Timber products

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☒ Lack of globally accepted and harmonized definitions

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Upstream value chain

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Chile

☒ China

☒ India

☒ Italy

☒ Spain

☒ Poland

☒ Serbia

☒ Sweden

☒ Turkey

☒ Brazil

☒ Canada

☒ France

☒ Latvia

☒ Mexico

☒ Czechia

☒ Estonia

☒ Finland

☒ Germany

- ☒ Austria
- ☒ Nigeria
- ☒ Portugal
- ☒ Slovenia
- ☒ Australia
- ☒ Indonesia
- ☒ United States of America
- ☒ United Kingdom of Great Britain and Northern Ireland

- ☒ Ireland
- ☒ Lithuania
- ☒ Netherlands
- ☒ New Zealand
- ☒ Switzerland
- ☒ Republic of Korea

(3.1.1.9) Organization-specific description of risk

The lack of a harmonized global definition for what deforestation means/is puts us at risk of inadvertently purchasing forest products that could have originated in in areas/from actions considered forest loss and/or conversion.

(3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Disruption to sales

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Short-term
- ☒ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

- ☒ About as likely as not

(3.1.1.14) Magnitude

Select from:

- ☒ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Misclassifying products as deforestation free could result in loss of sales with some customers, or potential challenges with complying with emerging regulations.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

(3.1.1.26) Primary response to risk

Engagement

☒ Engage in multi-stakeholder initiatives

(3.1.1.28) Explanation of cost calculation

We do not disclose this information.

(3.1.1.29) Description of response

Suppliers of pulpwood and chips are bound by written agreements where they agree not to deliver materials sourced from forests undergoing significant conversion. These suppliers also agree to adhere to the Principles of the Sustainable Forestry Initiative and Forest Stewardship Council (FSC) Chain of Custody, and FSC Controlled Wood Standards. Other suppliers are subject to Graphic Packaging's Supplier Code of Conduct, in which suppliers are expected to assess their operations and supply chains for deforestation risks, to track the origin of any forest materials used in goods or services, and to comply with laws and regulations to prevent deforestation and impacts to sensitive ecosystems. Graphic Packaging actively engaged with an SFI Task Group to create a module to address EUDR compliance. We continue to cooperate with SFI in the testing of practices and procedures for module compliance. Graphic Packaging has also adopted a new 2030 goal to sustainably source all purchased forest product materials. The Company will be leveraging its sustainable wood procurement practices to sustainably source other forest products including fuel wood, external board, secondary packaging materials, and other forest products. A key workstream in this effort will be aligning on a definition for deforestation.

Water

(3.1.1.1) Risk identifier

Select from:

☒ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☒ Regulation of discharge quality/volumes

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ United States of America

(3.1.1.7) River basin where the risk occurs

Select all that apply

☒ Mississippi River

(3.1.1.9) Organization-specific description of risk

Changes in discharge permit limits at the wood-based paperboard manufacturing facilities could lead to increased capital costs to upgrade existing wastewater treatment facilities to comply with more stringent permit limits.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased compliance costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ About as likely as not

(3.1.1.14) Magnitude

Select from:

☒ Unknown

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Lower discharge permit limits could result in capital costs to upgrade facilities, higher annual maintenance and operations costs, and increased risk of permit notice of violations resulting in reputational impacts.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

(3.1.1.26) Primary response to risk

Engagement

☒ Other engagement, please specify :Trade associations

(3.1.1.28) Explanation of cost calculation

We do not disclose this information.

(3.1.1.29) Description of response

Engage with and leverage trade associations like AF&PA and NAM to monitor emerging changes to environmental regulations, provide comments on draft, proposed, or revised regulations, and to lobby for regulations that are protective of water systems, reflect best available treatment technologies, and are not cost prohibitive to implement.

[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

☒ Assets

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ Less than 1%

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ 100%

(3.1.2.7) Explanation of financial figures

During our climate scenario analysis, Graphic Packaging used the EcoAct Climate Risk Platform (ECLR) to model site-level exposure to 28 physical acute and chronic hazards. We modelled exposure based on asset replacement value and asset fixed costs plus income. The hazards that we are most exposed to are heat

stress and changing temperature. For both of these hazards, 100% of our asset replacement value is exposed. We do not disclose financial details. Physical Risk only.

Forests

(3.1.2.1) Financial metric

Select from:

☒ Revenue

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ Less than 1%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ Less than 1%

(3.1.2.7) Explanation of financial figures

We do not disclose financial details. Transition Risk only.

Water

(3.1.2.1) Financial metric

Select from:

☒ OPEX

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ Less than 1%

(3.1.2.7) Explanation of financial figures

We do not disclose financial details. Transition risk only.
[Add row]

(3.2) Within each river basin, how many facilities are exposed to substantive effects of water-related risks, and what percentage of your total number of facilities does this represent?

Row 1

(3.2.1) Country/Area & River basin

United States of America

☒ Mississippi River

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

2

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☒ Unknown

(3.2.11) Please explain

Upstream and downstream value chain facilities are not exposed to identified potential substantive water-related risk of potential permitting changes for water discharges. We have effective mitigation plans in place and manufacturing redundancy to avoid upstream and downstream impacts.

[Add row]

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations
	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☒ Yes

(3.5.1) Select the carbon pricing regulation(s) which impact your operations.

Select all that apply

☒ Québec CaT - ETS

(3.5.2) Provide details of each Emissions Trading Scheme (ETS) your organization is regulated by.

Québec CaT - ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

2

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0.01

(3.5.2.3) Period start date

01/01/2024

(3.5.2.4) Period end date

12/31/2024

(3.5.2.5) Allowances allocated

30208

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

30556

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

32

(3.5.2.9) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.10) Comment

Allocated allowances are estimated based on awarded allowances (22,656) in January 2024 that represent approximately 75% of projected 2024 allowances (Estimated allocation = $22,656/0.75 = 30,208$). Final total awarded allowances will be assigned by year end 2025 following submission and review of the final 2024 emissions report. In 2023, awarded allowances were sufficient to cover emissions and no additional credits were required to be purchased.

[Fixed row]

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

Our process for complying with the Québec ETS is as follows: We monitor energy use and measure emitted greenhouse gases to determine the number of allowances needed to offset Graphic Packaging emissions. In the case that actual emissions exceed awarded allowances, then Graphic Packaging would need to either use banked allowances or purchase additional allowances. To avoid the need to purchase allowances above the cap, we work to implement energy efficiency measures at the Québec manufacturing facility. For example, in early 2024, the facility replaced 20 steam heaters with 10 gas fired heaters, which is projected to reduce steam consumption by 20%, which also reduces the amount of natural gas needed to generate steam onsite. As a result, we have maintained energy use and GHG emissions below the Quebec ETS limit and have not had to purchase any allowances.

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

☒ Yes, we have identified opportunities, and some/all are being realized

Forests

(3.6.1) Environmental opportunities identified

Select from:

☒ Yes, we have identified opportunities, and some/all are being realized

Water

(3.6.1) Environmental opportunities identified

Select from:

☒ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☒ Judged to be unimportant or not relevant

(3.6.3) Please explain

Water does not present a material risk or opportunity to the company. We are focused on other initiatives at this time.

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

- ☒ Use of renewable energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

- ☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Spain | <input checked="" type="checkbox"/> Poland |
| <input checked="" type="checkbox"/> Brazil | <input checked="" type="checkbox"/> Sweden |
| <input checked="" type="checkbox"/> Canada | <input checked="" type="checkbox"/> Austria |
| <input checked="" type="checkbox"/> France | <input checked="" type="checkbox"/> Croatia |
| <input checked="" type="checkbox"/> Mexico | <input checked="" type="checkbox"/> Estonia |
| <input checked="" type="checkbox"/> Finland | <input checked="" type="checkbox"/> Netherlands |
| <input checked="" type="checkbox"/> Germany | <input checked="" type="checkbox"/> New Zealand |
| <input checked="" type="checkbox"/> Ireland | <input checked="" type="checkbox"/> Switzerland |
| <input checked="" type="checkbox"/> Australia | <input checked="" type="checkbox"/> United States of America |
| <input checked="" type="checkbox"/> Indonesia | <input checked="" type="checkbox"/> United Kingdom of Great Britain and Northern Ireland |

(3.6.1.8) Organization specific description

As part of its roadmap to achieve the company's 1.5C aligned Scope 1 and 2 SBTs for GHG emissions reductions, the company will be increasing its use of renewable biomass fuels in the wood-based paperboard manufacturing facilities and purchased renewable electricity use across its global operations. These programs will also enable meeting customer expectations for low carbon packaging and position the company to potentially capture and store the biogenic emissions generated by the wood-based paperboard manufacturing facilities and create future carbon removal credits to either offset the Company's fossil fuel emissions or sell and create a new revenue stream.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Returns on investment in low-emission technology

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Medium-term
☒ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- ☒ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

- ☒ Medium

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Successful project implementation will result in products with a lower GHG intensity, which could provide a competitive advantage and customer preference for our products. The projects will also reduce O&M costs and could reduce exposure to future carbon pricing mechanisms and/or provide a future revenue stream by selling carbon credits.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

- ☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

We do not disclose this information.

(3.6.1.26) Strategy to realize opportunity

The company will be upgrading boilers and turbines in its manufacturing facilities to enable recovery and use of renewable biofuels for steam and electricity and reduce its use of natural gas. The Company will also explore sourcing renewable electricity to enable reducing Scope 2 GHG emissions for purchased electricity and in 2024 signed its first virtual power purchase agreement in Europe and a PPA in Brazil.

Forests

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.2) Commodity

Select all that apply

☒ Timber products

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☒ Improved supply chain engagement

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Upstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- | | |
|--|--|
| <input checked="" type="checkbox"/> Chile | <input checked="" type="checkbox"/> Brazil |
| <input checked="" type="checkbox"/> China | <input checked="" type="checkbox"/> Canada |
| <input checked="" type="checkbox"/> India | <input checked="" type="checkbox"/> France |
| <input checked="" type="checkbox"/> Italy | <input checked="" type="checkbox"/> Latvia |
| <input checked="" type="checkbox"/> Spain | <input checked="" type="checkbox"/> Mexico |
| <input checked="" type="checkbox"/> Poland | <input checked="" type="checkbox"/> Czechia |
| <input checked="" type="checkbox"/> Serbia | <input checked="" type="checkbox"/> Estonia |
| <input checked="" type="checkbox"/> Sweden | <input checked="" type="checkbox"/> Finland |
| <input checked="" type="checkbox"/> Turkey | <input checked="" type="checkbox"/> Germany |
| <input checked="" type="checkbox"/> Austria | <input checked="" type="checkbox"/> Nigeria |
| <input checked="" type="checkbox"/> Portugal | <input checked="" type="checkbox"/> Netherlands |
| <input checked="" type="checkbox"/> Slovenia | <input checked="" type="checkbox"/> New Zealand |
| <input checked="" type="checkbox"/> Australia | <input checked="" type="checkbox"/> Switzerland |
| <input checked="" type="checkbox"/> Indonesia | <input checked="" type="checkbox"/> Republic of Korea |
| <input checked="" type="checkbox"/> Lithuania | <input checked="" type="checkbox"/> United States of America |
| <input checked="" type="checkbox"/> United Kingdom of Great Britain and Northern Ireland | |

(3.6.1.8) Organization specific description

The company is advancing programs to achieve a deforestation free supply chain.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Other, please specify :Meeting stakeholder demands for deforestation free products - revenue preservation.

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☒ Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Demonstrating deforestation free paperboard packaging products and product packaging may provide a competitive advantage to protect and potentially grow the Company's market share for its products.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

This opportunity will not require a significant investment by Graphic Packaging. Costs are part of routine sourcing practices.

(3.6.1.26) Strategy to realize opportunity

Company will be extending its sustainable procurement practices for wood to all purchased forest products as it advances initiatives to demonstrate sustainable sourcing for all purchased forest products and comply with evolving deforestation free regulations.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☒ Development of new products or services through R&D and innovation

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Spain

☒ Brazil

☒ Canada

☒ France

☒ Mexico

☒ Finland

☒ Germany

☒ Ireland

☒ Nigeria

☒ Australia

☒ United Kingdom of Great Britain and Northern Ireland

☒ Poland

☒ Sweden

☒ Austria

☒ Croatia

☒ Estonia

☒ Indonesia

☒ Netherlands

☒ New Zealand

☒ Switzerland

☒ United States of America

(3.6.1.8) Organization specific description

Developing new packaging solutions that provide an alternative to plastic, have a lower carbon footprint, use renewable and/or recycled raw materials, are lightweight, recyclable, compostable or reusable can help customers meet their sustainability goals, and grow Graphic Packaging's market share.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.12) Magnitude

Select from:

☒ Low

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

Expanding or improving our product offering to include more sustainable products can grow our customer base and lead to increase revenues.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

We do not disclose this information.

(3.6.1.26) Strategy to realize opportunity

Graphic Packaging is exploring opportunities to innovate new products designed for improved recyclability and or compostability. For example, bio-based linings are an option we are exploring which will enable easier recycling and/or composting of paperboard products. In addition, we are working with value chain partners to increase community acceptance and recovery of more types of paperboard packaging, such as paper cups, in community recycling streams which will accelerate customer adoption of new packaging innovations.

[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

	Financial metric	Explanation of financial figures
Climate change	Select from: <input checked="" type="checkbox"/> Revenue	<i>We do not disclose financial information on these opportunities</i>
Forests	Select from: <input checked="" type="checkbox"/> Revenue	<i>We do not disclose financial information on these opportunities</i>

[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☒ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☒ More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☒ Executive directors or equivalent

☒ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☒ No

[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Forests	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Board chair
- ☒ Director on board
- ☒ Chief Executive Officer (CEO)
- ☒ Board-level committee
- ☒ President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☒ Other policy applicable to the board, please specify :Company Code of Conduct; Charter of the Nominating and Corporate Governance Committee; Charter of the Audit Committee; Sustainability Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☒ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- | | |
|--|---|
| <input checked="" type="checkbox"/> Reviewing and guiding annual budgets | <input checked="" type="checkbox"/> Overseeing and guiding major capital expenditures |
| <input checked="" type="checkbox"/> Overseeing and guiding scenario analysis | <input checked="" type="checkbox"/> Monitoring the implementation of the business strategy |
| <input checked="" type="checkbox"/> Overseeing the setting of corporate targets | <input checked="" type="checkbox"/> Overseeing reporting, audit, and verification processes |
| <input checked="" type="checkbox"/> Monitoring progress towards corporate targets | <input checked="" type="checkbox"/> Monitoring the implementation of a climate transition plan |
| <input checked="" type="checkbox"/> Reviewing and guiding innovation/R&D priorities | <input checked="" type="checkbox"/> Overseeing and guiding the development of a business strategy |
| <input checked="" type="checkbox"/> Overseeing and guiding acquisitions, mergers, and divestitures | |
| <input checked="" type="checkbox"/> Monitoring supplier compliance with organizational requirements | |
| <input checked="" type="checkbox"/> Monitoring compliance with corporate policies and/or commitments | |
| <input checked="" type="checkbox"/> Overseeing and guiding the development of a climate transition plan | |
| <input checked="" type="checkbox"/> Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities | |

(4.1.2.7) Please explain

As set forth in our Corporate Governance Guidelines, our Board is responsible for reviewing, approving, and monitoring business strategies and financial performance and ensuring appropriate oversight is in place. The Board fulfills these responsibilities through a number of practices including approval of the annual operating and strategic long-range plans, review of results against such plans, and review and approval of significant corporate actions. In addition, the Board is responsible for the oversight of our sustainability and climate strategy governance, standards, goals, and performance and has assigned principal oversight of our sustainability policy

and practices to the Nominating and Corporate Governance Committee. The Nominating and Corporate Governance Committee (NCGC) of the Board considers current and emerging social and environmental trends as well as major legislative and regulatory developments and other public policy issues that may impact our business operations or stakeholders. The Committee also reviews the Company's policy and practices for consistency with its ESG and climate commitments including goals, performance metrics, mitigation plans, and public reporting, and makes recommendations to the Board and management. Oversight of governance matters such as enterprise risk management, including climate risk, is assigned to the Audit Committee.

Forests

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Board chair
- ☒ Director on board
- ☒ Chief Executive Officer (CEO)
- ☒ Board-level committee
- ☒ President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- ☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Other policy applicable to the board, please specify :Company Code of Conduct; Charter of the Nominating and Corporate Governance Committee; Charter of the Audit Committee; Sustainability Policy; Sustainable Forestry and Deforestation Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Reviewing and guiding annual budgets
- ☒ Overseeing the setting of corporate targets
- ☒ Monitoring progress towards corporate targets
- ☒ Reviewing and guiding innovation/R&D priorities
- ☒ Overseeing and guiding major capital expenditures
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☒ Monitoring the implementation of the business strategy
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Monitoring the implementation of a climate transition plan
- ☒ Overseeing and guiding the development of a business strategy
- ☒ Monitoring supplier compliance with organizational requirements

(4.1.2.7) Please explain

The Board does this through a number of practices, e.g. approval of annual operating and strategic long-range plans, review of results against such plans and review and approval of significant corporate actions. In addition, the Board is responsible for the oversight of our sustainability and forest strategy, governance standards, goals, and performance and has assigned principal oversight of our sustainability policy and practices to the Nominating and Corporate Governance Committee. The NCGC considers current and emerging ESG trends, major regulatory developments and public policy issues that may impact our business operations. The NCGC reviews the Company's policy and practices for consistency with its ESG and forest commitments, including goals, mitigation plans, and public reporting and makes recommendations to the Board and management. The Audit Committee oversees our integrated risk management framework that is designed to identify, prioritize, manage, monitor and communicate our top enterprise risks, including forest-related risks. The NCGC makes recommendations on ESG actions to the Board and has sustainability/ESG as a standard meeting agenda item. In June 2025, the NCGC reviewed and approved the Company's sustainability report, including reporting on forest topics.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Board chair
- ☒ Director on board
- ☒ Chief Executive Officer (CEO)
- ☒ Board-level committee
- ☒ President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☒ Other policy applicable to the board, please specify :Company Code of Conduct; Charter of the Nominating and Corporate Governance Committee; Charter of the Audit Committee; Sustainability Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☒ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Reviewing and guiding annual budgets
- ☒ Overseeing the setting of corporate targets
- ☒ Monitoring progress towards corporate targets
- ☒ Overseeing and guiding major capital expenditures
- ☒ Monitoring the implementation of the business strategy
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Overseeing and guiding the development of a business strategy
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Board does this through a number of practices, e.g. approval of annual operating and strategic long-range plans, review of results against such plans and review and approval of significant corporate actions. In addition, the Board is responsible for the oversight of our sustainability and water strategy, governance standards, goals, and performance and has assigned principal oversight of our sustainability policy and practices to the Nominating and Corporate Governance Committee. The NCGC considers current and emerging ESG trends, major regulatory developments and public policy issues that may impact our business operations. The NCGC reviews the Company's policy and practices for consistency with its ESG and water commitments, including goals, mitigation plans, and public reporting and makes

recommendations to the Board and management. The Audit Committee oversees our integrated risk management framework that is designed to identify, prioritize, manage, monitor and communicate our top enterprise risks, including water-related risks. The NCGC makes recommendations on ESG actions to the Board and has sustainability/ESG as a standard meeting agenda item. In June 2025, the NCGC reviewed and approved the Company's sustainability report, including reporting on water topics.

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Board chair
- ☒ Director on board
- ☒ Chief Executive Officer (CEO)
- ☒ Board-level committee
- ☒ President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- ☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Other policy applicable to the board, please specify :Company Code of Conduct; Charter of the Nominating and Corporate Governance Committee; Charter of the Audit Committee; Sustainability Policy; Sustainable Forestry and Deforestation Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Sporadic – agenda item as important matters arise

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Monitoring supplier compliance with organizational requirements

(4.1.2.7) Please explain

The Board does this through a number of practices, e.g. approval of annual operating and strategic long-range plans, review of results against such plans and review and approval of significant corporate actions. In addition, the Board is responsible for the oversight of our sustainability and forest/biodiversity strategy, governance standards, goals, and performance and has assigned principal oversight of our sustainability policy and practices to the Nominating and Corporate Governance Committee. The NCGC considers current and emerging ESG trends, major regulatory developments and public policy issues that may impact our business operations. The NCGC reviews the Company's policy and practices for consistency with its ESG and forest commitments, including goals, mitigation plans, and public reporting and makes recommendations to the Board and management. The Audit Committee oversees our integrated risk management framework that is designed to identify, prioritize, manage, monitor and communicate our top enterprise risks, including biodiversity-related risks. The NCGC makes recommendations on ESG actions to the Board and has sustainability/ESG as a standard meeting agenda item. In June 2025, the NCGC reviewed and approved the Company's sustainability report, including reporting on biodiversity topics.

[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

- ☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Additional training

☒ Course certificate (relating to environmental issues), please specify :Competent Boards Climate & Biodiversity Certificate

Experience

☒ Executive-level experience in a role focused on environmental issues

Forests

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Additional training

☒ Course certificate (relating to environmental issues), please specify :Competent Boards Climate & Biodiversity Certificate

Experience

☒ Executive-level experience in a role focused on environmental issues

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Forests	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a climate transition plan
- ☒ Implementing a climate transition plan
- ☒ Conducting environmental scenario analysis
- ☒ Managing annual budgets related to environmental issues

- ☒ Implementing the business strategy related to environmental issues
- ☒ Developing a business strategy which considers environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

- ☒ Other, please specify :General Counsel

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

The Executive Leadership Team (ELT) operationalizes governance of ESG matters including climate related issues through the VP Chief Sustainability Officer (CSO). The CSO works with the ELT and senior leaders from each of the business segments and major corporate functions (e.g. operations, research and development, finance, legal, HR, investor relations, procurement, EHS, marketing, etc.) to advance ESG and climate related initiatives. The CSO is accountable for developing strategy and executing the day-to-day requirements to meet the Company's sustainability goals. Further the CSO is uniquely qualified to engage with investors, customers, suppliers, and other external stakeholders to ensure comprehensive value chain execution of the sustainability program. Our president/CEO serves as executive sponsor of sustainability, and the ELT serves as our ESG Steering Team. Together they are dedicated to accelerating our sustainability journey, growing our Company by driving a sustainable recyclable product portfolio, effectively managing all our resources, and enhancing social and environmental value. Climate related issues are formally monitored via a report that compares current year data to both previous year and planned metrics. The Company develops and executes countermeasures as appropriate based on observed emissions trends. For example in 2024 the ELT was engaged in various climate related conversations and supported work to enter into the Company's first VPPA in Europe.

Forests

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Other C-Suite Officer, please specify :SVP Supply Chain

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing supplier compliance with environmental requirements
- ☒ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a business strategy which considers environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Managing annual budgets related to environmental issues
- ☒ Managing environmental reporting, audit, and verification processes

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

The SVP Supply Chain (SVPSC) has direct oversight of the wood, recovered fiber, and forest products procurement teams and administration of the Company's fiber certification and sourcing compliance programs. The SVPSC reports to the CEO ELT on forest-related risks & opportunities and performance on targets. This includes briefings on forest demand and market availability. The SVPSC works with the CSO on aligning the Company's Leadership Team on strategic decisions regarding mitigating forests risks, enhancing our reputation and positioning the Company for future success. The Company routinely monitors wood purchases, wood balances and availability, and reviews of forest product sourcing practices, and the learnings are used to improve forest product sourcing practices. Our president/CEO serves as executive sponsor of sustainability and the ELT serves as our ESG Steering Team. Together they are responsible for embedding consideration for ESG risks and opportunities, including forests -related issues, into our business strategy, plans and budgets; and achieving our sustaining forests sustainability goal. The ELT operationalizes governance of forest-related issues, through the SVPSC and CSO. The SVPSC and CSO work with the ELT, the VP Supply Chain Sustainability, and senior leaders from each of our business segments and major corporate functions (e.g., operations, R&D, finance, legal, HR, IR, procurement, EHS, etc.) to advance ESG and forest-related initiatives. The CEO and ELT meet at least quarterly to monitor progress towards achieving goals and regularly report to the board on a variety of topics that directly or indirectly involve forest-related issues (such as the Company's forest sustainability initiatives, status of fiber certification programs including FSC, SFI and PEFC, and progress against forest-related goals and targets). In 2024, the supply chain team updated its sustainable forestry policy to include an expanded definition for deforestation.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets

- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a business strategy which considers environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Managing environmental reporting, audit, and verification processes

(4.3.1.4) Reporting line

Select from:

- ☒ Other, please specify :General Counsel

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

The CSO is responsible for managing Graphic Packaging's progress addressing water related topics as well as overseeing water risk. The CSO works with the operations teams to track, report, develop, and implement strategies to achieve the company's water objectives. The CSO also evaluates current and future water related risks at different sites. The Board receives updates on the company's progress managing water use in the paperboard manufacturing division. The Board also receives updates on sites that are water stressed and reports on general water usage metrics. The ELT operationalizes governance of ESG matters including water related issues through the CSO. The CSO works with the ELT and senior leaders from each of our business segments and major corporate functions (e.g. operations, research and development, finance, legal, HR, investor relations, procurement, EHS, marketing, etc.) to advance ESG and water related initiatives. The CSO is accountable for developing strategy and executing the day-to-day requirements to meet the Company's sustainability goals. Further the CSO is uniquely qualified to engage with investors, customers, suppliers, and other external stakeholders to ensure comprehensive value chain execution of the sustainability program. Our president/CEO serves as executive sponsor of sustainability, and the ELT serves as our ESG Steering Team. Together they are dedicated to accelerating our sustainability journey growing our Company by driving a sustainable recyclable product portfolio, effectively managing all our resources, and enhancing social and environmental value. In 2024 the ELT supported work to increase recycled water use efficiency through the Waco paperboard manufacturing facility investment and manufacturing optimization program.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☒ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a business strategy which considers environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Managing environmental reporting, audit, and verification processes

(4.3.1.4) Reporting line

Select from:

- ☒ Other, please specify :General Counsel

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ As important matters arise

(4.3.1.6) Please explain

The CSO is responsible for monitoring external biodiversity trends and understanding how these trends may present risks and opportunities to the company and how the company's actions may potentially create biodiversity impacts. The CSO works closely with the SVPSC, the VP Supply Chain Sustainability, and the VP HSE to assess and manage biodiversity related IROs and develop appropriate business strategies to present to the ELT and Board. Biodiversity related IROs are most closely related to the Company's forest products sourcing processes. The ELT operationalizes governance of ESG matters, including biodiversity related issues, through the CSO. The CSO works with the ELT and senior leaders from each of our business segments and major corporate functions (e.g. operations, research and development, finance, legal, HR, investor relations, procurement, EHS, etc.) to advance ESG and biodiversity related initiatives as part of our management of forest related topics. The CSO is accountable for developing strategy and executing the day-to-day requirements to meet the Company's sustainability goals. Further the CSO is uniquely qualified to engage with investors, customers, suppliers, and other external stakeholders to ensure comprehensive value chain execution of the sustainability program. Our president/CEO serves as executive sponsor of sustainability, and the ELT serves as our ESG Steering Team. Together they are dedicated to accelerating our sustainability journey, growing our Company by driving a sustainable recyclable product portfolio, effectively managing all our resources, and enhancing social and environmental value.

[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

At this time the company is focused on implementing data management systems to enable meeting future regulatory reporting compliance and data assurance obligations. These systems will be necessary to support setting and managing future monetary incentives for the C-Suite and Board. We will evaluate setting monetary incentives for the management of environmental issues once the tracking system is in place.

Forests

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

At this time the company is focused on implementing data management systems to enable meeting future regulatory reporting compliance and data assurance obligations. These systems will be necessary to support setting and managing future monetary incentives for the C-Suite and Board. We will evaluate setting monetary incentives for the management of environmental issues once the tracking system is in place.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

At this time the company is focused on implementing data management systems to enable meeting future regulatory reporting compliance and data assurance obligations. These systems will be necessary to support setting and managing future monetary incentives for the C-Suite and Board. We will evaluate setting monetary incentives for the management of environmental issues once the tracking system is in place.

[Fixed row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.6.1.2) Level of coverage

Select from:

- ☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Direct operations

(4.6.1.4) Explain the coverage

The Code of Conduct outlines the principles, policies, and laws that guide actions on the job. The Code applies to every employee, officer, director of the Company and its subsidiaries, and contractor working under the Company's control. It shows how to be responsible for ourselves and for each other. The Code also protects our personal integrity and safety at all times, because it gives us a way to respond to unethical actions. The Code addressed ethical conduct, compliance with laws, reporting concerns, human rights, equality, sustaining the planet, and other responsible business topics.

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to comply with regulations and mandatory standards

☒ Other environmental commitment, please specify :Commitment to Improve operations – for example, by saving energy and water and minimize our environmental footprint – for example, by recycling and reusing materials whenever possible

Water-specific commitments

☒ Commitment to reduce water withdrawal volumes

Social commitments

☒ Commitment to promote gender equality and women's empowerment

☒ Commitment to respect internationally recognized human rights

Additional references/Descriptions

☒ Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☒ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation

☒ Yes, in line with another global environmental treaty or policy goal, please specify :UN Global Compact and UN SDGs

(4.6.1.7) Public availability

Select from:

☒ Publicly available

(4.6.1.8) Attach the policy

GPI_COC_FINAL_031125 (2).pdf

Row 2

(4.6.1.1) Environmental issues covered

Select all that apply

☒ Climate change

☒ Water

(4.6.1.2) Level of coverage

Select from:

☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☒ Direct operations

(4.6.1.4) Explain the coverage

The Company is committed to protecting the health and safety of its employees, visitors, and contractors and the protection of the environment. We believe that work-related illnesses, injuries, and environmental incidents are preventable. It is our vision to have all employees and contractors working safely and in an environmentally responsible manner. The policy sets expectations to reduce impacts to the environment.

(4.6.1.5) Environmental policy content

Environmental commitments

☒ Commitment to comply with regulations and mandatory standards

☒ Commitment to engage in integrated, multi-stakeholder landscape (including river basin) initiatives to promote shared sustainability goals

Climate-specific commitments

☒ Other climate-related commitment, please specify :Reduce emissions

Water-specific commitments

☒ Commitment to control/reduce/eliminate water pollution

☒ Commitment to reduce water withdrawal volumes

Social commitments

☒ Other social commitment, please specify :Promote environmental awareness and engagement among employees and key stakeholders

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

- ☒ Yes, in line with the Paris Agreement
- ☒ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation
- ☒ Yes, in line with another global environmental treaty or policy goal, please specify :UN Global Compact and UN SDGs

(4.6.1.7) Public availability

Select from:

- ☒ Publicly available

(4.6.1.8) Attach the policy

Health, Safety, and Environment Policy (Global)_February 2023_English.pdf

Row 3

(4.6.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.6.1.2) Level of coverage

Select from:

- ☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Upstream value chain

(4.6.1.4) Explain the coverage

The Company's direct operations and upstream supply chain represent the largest potential source for environmental impacts and risks connected to its commercial activities. The Procurement organization is committed to building a sustainable Supplier base that shares Graphic Packaging's commitment to operate ethically and responsibly and developed a Global Supplier Code of Conduct (GSCOC) to define minimum expectations in the areas of business integrity, anti-corruption, human rights, labor practices, health and safety, and environmental stewardship. The GSCOC complements the Company's COC and other policies and standards referenced in the GSCOC. All suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with the Company ("Suppliers") are expected to follow this GSCOC and all relevant local laws, regulations, rules, and policies that may apply to the specific services provided by Suppliers to the Company. Suppliers are also expected to communicate and apply the GSCOC and relevant policies with their suppliers.

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to avoidance of negative impacts on threatened and protected species
- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Other environmental commitment, please specify :Demonstrate a commitment to preserving the environment and complying with all applicable environmental laws and regulations.

Climate-specific commitments

- ☒ Other climate-related commitment, please specify :Demonstrate a commitment to mitigating the impacts of climate change

Forests-specific commitments

- ☒ Commitment to the use of the High Conservation Value (HCV) approach
- ☒ Other forests-related commitment, please specify :Demonstrate a commitment to preventing deforestation and biodiversity loss

Water-specific commitments

- ☒ Other water-related commitment, please specify :Demonstrate a commitment to preserving the environment and complying with all applicable environmental laws and regulations.

Social commitments

- ☒ Commitment to promote gender equality and women's empowerment
- ☒ Commitment to respect internationally recognized human rights

Additional references/Descriptions

- ☒ Description of dependencies on natural resources and ecosystems
- ☒ Description of environmental requirements for procurement
- ☒ Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

- ☒ Yes, in line with the Paris Agreement
- ☒ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation
- ☒ Yes, in line with another global environmental treaty or policy goal, please specify :UN Global Compact and UN SDGs

(4.6.1.7) Public availability

Select from:

- ☒ Publicly available

(4.6.1.8) Attach the policy

Global-Supplier-Code-of-Conduct_Oct.-2024_English.pdf

Row 4

(4.6.1.1) Environmental issues covered

Select all that apply

- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.6.1.2) Level of coverage

Select from:

- ☒ Selected commodities only

(4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain

(4.6.1.4) Explain the coverage

The Company's direct operations and upstream supply chain represent the largest potential source for environmental impacts and risks connected to its commercial activities. The Company's Sustainable Forestry and Deforestation Policy outlines its expectations for sustainable sourcing wood for its operations. The Company is committed to sourcing forest-based raw materials and paperboard materials from sustainably managed, certified chain of custody and non-controversial sources. Company's Sustainable Forestry and Deforestation Policy promotes the principles of sustainable forestry and the Company's commitment to avoiding deforestation. The Policy defines unacceptable and controversial sources that should be avoided, expectations for complying with laws, and for implementing the FSC core labor requirements and SFI principles. The Policy applies to all employees, contractors working under the Company's control, and Suppliers of forest materials.

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to avoidance of negative impacts on threatened and protected species
- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to engage in integrated, multi-stakeholder landscape (including river basin) initiatives to promote shared sustainability goals
- ☒ Commitment to respect legally designated protected areas
- ☒ Commitment to stakeholder engagement and capacity building on environmental issues

Forests-specific commitments

- ☒ Commitment to facilitate the inclusion of smallholders into the value chain
- ☒ Commitment to no-deforestation by target date, please specify :2030
- ☒ Commitment to the use of the High Conservation Value (HCV) approach

Water-specific commitments

- ☒ Other water-related commitment, please specify :Commitment to protect water resources

Social commitments

- ☒ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities
- ☒ Commitment to respect internationally recognized human rights
- ☒ Commitment to secure Free, Prior, and Informed Consent (FPIC) of indigenous people and local communities

Additional references/Descriptions

- ☒ Description of commodities covered by the policy
- ☒ Description of dependencies on natural resources and ecosystems
- ☒ Description of environmental requirements for procurement

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

- ☒ Yes, in line with another global environmental treaty or policy goal, please specify :UN SDG 15 - Life on Land

(4.6.1.7) Public availability

Select from:

- ☒ Publicly available

(4.6.1.8) Attach the policy

Sustainable-Forestry-and-Deforestation-Policy_11202024.pdf

Row 5

(4.6.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water

- ☒ Biodiversity

(4.6.1.2) Level of coverage

Select from:

- ☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain

(4.6.1.4) Explain the coverage

The Sustainability Policy outlines the principles and actions that guide our operations as a responsible Company committed to delivering on our Better, Every Day sustainability promise. At Graphic Packaging, we package life's everyday moments for a renewable future, and we want each one of those moments to be better for people and the planet. The Policy applies to every employee, officer, director of the Company and its subsidiaries, and contractors working under the Company's control. It shows how to be responsible for ourselves, for each other, and for the planet.

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to a circular economy strategy environmental issues
- ☒ Commitment to stakeholder engagement and capacity building on
- ☒ Commitment to respect legally designated protected areas
- ☒ Other environmental commitment, please specify :**Minimize hazardous and non-recyclable waste; Source raw materials responsibly – prioritizing reclaimed, recycled, or renewable inputs**
- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to take environmental action beyond regulatory compliance
- ☒ Commitment to avoidance of negative impacts on threatened and protected species

Climate-specific commitments

- ☒ Commitment to net-zero emissions

☒ Other climate-related commitment, please specify :Reduce GHG emissions throughout our operations and value chain; Conserve energy and prioritize the use of renewable fuels and electricity; Reduce non-GHG air & atmospheric emissions

Forests-specific commitments

☒ Other forests-related commitment, please specify :Avoid deforestation, defined as unmitigated, human-caused conversion of natural forests to non-forest land use.

Water-specific commitments

☒ Commitment to control/reduce/eliminate water pollution

☒ Commitment to the conservation of freshwater ecosystems

☒ Commitment to water stewardship and/or collective action

☒ Other water-related commitment, please specify :Promote the sustainable use and recycling of water, guard against leaks or accidental releases, and only discharge appropriately treated effluent water to municipal systems or the environment.

Social commitments

☒ Commitment to respect internationally recognized human rights

☒ Other social commitment, please specify :Uphold international human rights and foster an engaged workforce dedicated to employee development, wellbeing, and inclusion; Achieve an injury-free workplace; Support the needs of the communities where we operate

Additional references/Descriptions

☒ Description of environmental requirements for procurement

☒ Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☒ Yes, in line with the Paris Agreement

☒ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation

☒ Yes, in line with another global environmental treaty or policy goal, please specify :UN Global Compact and UN SDGs

(4.6.1.7) Public availability

Select from:

☒ Publicly available

(4.6.1.8) Attach the policy

Global Sustainability Policy.pdf

[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☒ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☒ Forest Stewardship Council (FSC)

☒ Programme for the Endorsement of Forest Certification (PEFC)

☒ Science-Based Targets Initiative (SBTi)

☒ Sustainable Forestry Initiative (SFI)

☒ UN Global Compact

(4.10.3) Describe your organization's role within each framework or initiative

On November 2, 2021, Graphic Packaging became a signatory to the United Nations Global Compact (UNGC), committing to act in accordance with the 10 principles of the compact, covering human rights, labor, the environment, and anti-corruption, and to take action in support of broader United Nations goals. The Company set and validated near-term SBTs in 2023 through the SBTi and shared its decarbonization plan in February 2024. Forest certification programs including FSC, SFI and PEFC provide a backbone for our approach to sustaining forests and sourcing forest product materials at Graphic Packaging. All these systems include commitments not to contribute to deforestation in our wood sourcing practices for paperboard manufacturing and for other forest products. Our President/CEO served as the Board Chair for SFI in 2024 and until the term ended in April 2025. Our forestry subject matter experts are actively engaged on work committees at SFI.

[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

- ☒ Yes, we engaged directly with policy makers
- ☒ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

- ☒ No, but we plan to have one in the next two years

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

- ☒ Yes

(4.11.6) Types of transparency register your organization is registered on

Select all that apply

- ☒ Mandatory government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

Graphic Packaging is registered with the US Federal Election Commission (FEC). The company's ID is C00282566. The FEC provides a transparent account of US political campaign contributions.

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Public policy, at all levels of government, can have a significant impact on our Company. Therefore, Graphic Packaging stays informed on domestic, foreign and international public policies, develops and executes strategies to educate and influence public policy decisions, and aligns our public policy strategy execution with the Company's corporate goals, including goals addressing climate change and the environment. Graphic Packaging's VP of Government Affairs provides strategic direction for public policy engagement and ensures that all activities are consistent with the Company's strategy. Internal and external outreach to ensure alignment with Company goals and strategy are critical and include reviewing strategy formally each year and on an ad hoc basis with Graphic Packaging's President and CEO, members of the Executive Team and updates to the Company's Board of Directors. Engagement actions include regular meetings with public officials and policymakers, engaging with trade and business associations, customers, suppliers, employees, communities, and nongovernmental organizations on issues of mutual concern. Our engagement is centered around using facts, science, and benefits of legislation and regulation to deliver a positive impact. Our public policy is consistent with our environmental commitments and support growth in the use of renewable energy, sustainable regulation, recycling of our packaging solutions and appropriate environmental reporting.

[Fixed row]

(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

Row 1

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Extended Producer Responsibility (EPR) is a regulatory framework that assigns end of life responsibility to manufacturers of packaging and products that are placed in the market. EPR schemes are in place in most European Union where they are increasingly granular. In addition, they have been implemented in UK and are in a few US states in the last year. We engage with policy makers on EPR directly in some countries and through our industry associations in others.

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☒ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Low-impact production and innovation

☒ Extended Producer Responsibility (EPR)

- ☒ Recycling and recyclability
- ☒ Sustainable production and consumption

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

- ☒ National

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

- ☒ Canada
- ☒ United States of America
- ☒ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

- ☒ Oppose

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

Graphic Packaging appreciates that EPR policy is different in each region that the company operates. Producer Responsibility assigns accountability to business and recognizes the important role that business has in recovering recyclable materials from the products and packaging that are placed into the market. Recycling is viewed as a climate change solution and there will be continued expectation that companies will place packaging solutions that are circular in the market. We are committed to market-driven paper and paper-based packaging recovery and recycling efforts, which currently demonstrate high recycling and recovery rates. We do not believe new EPR frameworks are necessary for materials with high recovery and recycling rates, such as paper and fiber-based packaging, but do understand these frameworks offer potential value to increase recycling rates for packaging materials with low recovery rates. Where EPR schemes are already in place, we support scaled fee structures that use actual material recovery (e.g., lower fees for highly recovered materials), which will encourage the use of materials that are highly recovered and avoid the transition to alternative materials that are not circular. If EPR is mandated, we support EPR fees that are modulated, balanced and reflect the actual impact of specific packaging compositions on recyclability.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

- ☒ Ad-hoc meetings
- ☒ Discussion in public forums
- ☒ Participation in working groups organized by policy makers
- ☒ Responding to consultations

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

According to the US EPA recycling is viewed as a climate change solution. Recycling paper packaging materials rather than sending to landfill can help mitigate impacts to climate change by reducing energy use and avoiding GHG emissions generated by degradation in a landfill. Graphic Packaging is committed to making a positive impact on the environment and we view recycling of our packaging solutions as one of several strategic initiatives to support our environmental commitments. In 2024, we recycled more than a million tons of waste paperboard packaging. EPR assigns responsibility for the disposal of packaging to producers and marketers that place the material on the market. The fees, when assigned with an Ecomodulation framework, are designed to improve recycling capabilities for materials that are subject to a fee. Further, the fees are anticipated to encourage selection of packaging that is highly circular. Paper and paperboard packaging participates in a highly circular market with high recovery rates in the US (65-69%, AF&PA) and Europe (83.2% in 2022, Eurostat). The high recovery rates demonstrate that there is a well-functioning market that encourages investment for capability improvements and capacity increases by industry stakeholders. A majority (97%) of the Company's packaging solutions are considered highly recyclable. Certain packaging solutions are only accepted regionally, presenting an opportunity to increase acceptance nationally and achieve the highest level of circularity. The Company has some solutions that are challenged from a recycling perspective. The challenge for the Company is identifying recycling access gaps for its packaging solutions and engage to increase recycling access and/or use innovation to develop more recyclable alternatives. Unbalanced EPR fees can negatively impact the Company's ability to invest to increase recycling of our packaging solutions or for paperboard to substitute less circular plastic solutions which may be lighter. The Company measures the revenue that is generated from packaging solutions that are recyclable and strives to manufacture and sell packaging solutions that are widely recycled. The efficiency of our engagement with policy markers is reflected when legislations, guidance and standards reflect a fact-based approach to EPR fees that will actually support circularity rather than hinder it.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

- ☒ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

- ☒ Paris Agreement

☒ Another global environmental treaty or policy goal, please specify :UN SDG 12 Responsible Consumption and Production

[Add row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

☒ Other trade association in North America, please specify :American Forest & Paper Association; Paperboard Packaging Council; Paper Recycling Coalition; Foodservice Packaging Institute

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

☒ Forests

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ Yes, and they have changed their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The American Forest and Paper Association (AF&PA) is the primary industry organization that Graphic Packaging engages, with several employees working on association sponsored teams to support advocacy. While our engagement may be more comprehensive with AF&PA, we also have similar engagement points with the other industry associations. AF&PA members have long been stewards of our planet's resources. The industry produces recyclable products made from renewable resources, trees, and believes that sustainable practices today will yield positive results for a better tomorrow. The industry has developed the Better Practices Better Planet 2030 (BPBP 2030) program to measure the collective progress for the industry. Graphic Packaging participated in developing the BPBP 2030 goals, approved the goals and provides data to measure the industry progress. The goals of the program align with several ESG goals of Graphic Packaging. The AF&PA's sustainability initiative is a proactive commitment to the long-term success of our industry, our communities, our environment and the nearly 900,000 men and women who make the paper and wood products that are vital to the lives of people around the world. This initiative aligns the objectives of one of the United Nations Sustainable Development Goals. The six goals targeted within Better Practices Better Planet focus on increasing paper recovery for recycling, improving energy efficiency, reducing greenhouse gas emissions, promoting sustainable forestry practices, improving workplace safety and reducing water use. BPBP 2030 goals were established in 2021, and progress is reported at www.afandpa.org/priorities/sustainability Graphic Packaging supports efforts by the organization to conduct industry research and develop industry tools to inform policy decisions that impact the forestry and forest products sectors. Graphic Packaging has a Non-Disclosure Agreement with the AF&PA and cannot provide our membership fees.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☒ Paris Agreement

☒ Another global environmental treaty or policy goal, please specify :UN SDGs 6, 12, 13, and 15

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☒ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

☒ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☒ GRI

☒ TCFD

☒ Other, please specify :SASB UNGC Communication on Progress

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☒ Climate change

☒ Forests

☒ Water

☒ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☒ Complete

(4.12.1.5) Content elements

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Strategy | <input checked="" type="checkbox"/> Risks & Opportunities |
| <input checked="" type="checkbox"/> Governance | <input checked="" type="checkbox"/> Value chain engagement |
| <input checked="" type="checkbox"/> Emission targets | <input checked="" type="checkbox"/> Dependencies & Impacts |
| <input checked="" type="checkbox"/> Emissions figures | <input checked="" type="checkbox"/> Biodiversity indicators |
| <input checked="" type="checkbox"/> Commodity volumes | <input checked="" type="checkbox"/> Public policy engagement |
| <input checked="" type="checkbox"/> Water accounting figures | |
| <input checked="" type="checkbox"/> Water pollution indicators | |
| <input checked="" type="checkbox"/> Content of environmental policies | |
| <input checked="" type="checkbox"/> Deforestation- and conversion-free (DCF) status metrics | |
| <input checked="" type="checkbox"/> Other, please specify : Forest Products sourcing processes and metrics | |

(4.12.1.6) Page/section reference

See pages 1-183 in the Company's 2024 Impact Report

(4.12.1.7) Attach the relevant publication

2024-Graphic-Packaging-Impact-Report-1.pdf

(4.12.1.8) Comment

The Company's annual sustainability report provides a comprehensive discussion of climate, water, forest, and biodiversity topics related to the Company's operations.

[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ First time carrying out analysis

Forests

(5.1.1) Use of scenario analysis

Select from:

☒ No, but we plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☒ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

The company has been focused on developing and validating SBTs and the associated decarbonization plans for GHG emissions reductions. The first phase of the Company's climate scenario analyses was completed in the 2024. Future phases of this work will include an assessment of impacts on our woodbasket, and are tentatively planned to be completed in the 2025-2026 time frame.

Water

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ Annually

[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ IEA NZE 2050

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

- ☒ Policy
- ☒ Market
- ☒ Reputation
- ☒ Technology
- ☒ Liability

(5.1.1.6) Temperature alignment of scenario

Select from:

- ☒ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2000

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2030
- ☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

- ☒ Global regulation
- ☒ Level of action (from local to global)
- ☒ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario is based on RCP 2.6 for physical events, SSP1 for social/political changes, and IEA This scenario is characterized by an economy that reaches net-zero by 2050. Decarbonization is led by the power generation and transportation sectors – each decarbonize rapidly, primarily through renewables and electrification. This transition creates widespread opportunities for companies providing low-carbon goods & services, as customer demand soars. Public investment in the transition also increases, while investors look for safe places to put their money. Even in this scenario, global emissions drive up mean air temperatures over 1°C above late 20th century levels by 2050. This increases physical climate risks such as heatwaves, hurricanes, and extreme precipitation – but to a less extreme degree than in a High Carbon World. There is also an increase in adoption and stringency of climate policy. This scenario is based on RCP 2.6 for physical events, SSP1 for social/political changes, and IEA NZE for energy trends.

(5.1.1.11) Rationale for choice of scenario

This scenario was chosen since it represents a world in which transition risks are greatest. This allows us to better understand the extent of potential impacts that transition risks could have on our organization and how we can mitigate those risks in a low-carbon future.

Water

(5.1.1.1) Scenario used

Water scenarios

☒ WRI Aqueduct

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Chronic physical

☒ Policy

(5.1.1.7) Reference year

2023

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2030

☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

☒ Global regulation

Relevant technology and science

☒ Granularity of available data (from aggregated to local)

Macro and microeconomy

☒ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Scenarios were run using the Optimistic, Pessimistic, and Business as Usual growth scenarios.

(5.1.1.11) Rationale for choice of scenario

Goal is to understand predicted potential changes in future stressed watersheds under different population growth and climate model scenarios and potential material impacts on business operations.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ SSP5

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 4.0°C and above

(5.1.1.7) Reference year

2000

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2030
- ☒ 2050
- ☒ 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

- ☒ Global regulation
- ☒ Level of action (from local to global)
- ☒ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario is based on RCP 8.5 for physical events, SSP5 for social/political changes, and IEA STEPS for energy trends. This scenario is characterized by an economy that largely fails to decarbonize – emissions reductions are offset by an increasing population and GDP. Global emissions double by 2050. Emissions drive up mean air temperatures 3.3°C above late 20th century levels by 2050 globally, exacerbating extreme weather events such as hurricanes and heatwaves. Governments fail to take meaningful climate action so some transition risks like carbon pricing are muted. However, this also means there's less investment into innovation and slower development of low-carbon technologies. In this scenario, this world places increasing faith in competitive markets, innovation and participatory societies to produce rapid technological progress and development of human capital as the path to sustainable development. Global markets are increasingly integrated. There are also strong investments in health, education, and institutions to enhance human and social capital. At the same time, the push for economic and social development is coupled with the exploitation of abundant fossil fuel resources and the adoption of resource and energy intensive lifestyles around the world. All these factors lead to rapid growth of the global economy, while global population peaks and declines in the 21st century. Local environmental problems like air pollution are successfully managed. There is faith in the ability to effectively manage social and ecological systems, including by geo-engineering if necessary.

(5.1.1.11) Rationale for choice of scenario

This scenario was chosen since it represents a world in which physical risks are greatest. This allows us to better understand the extent of potential impacts that physical risks could have on our organization and how we can potentially adapt in a high-carbon future.

[Add row]

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- ☒ Risk and opportunities identification, assessment and management
- ☒ Strategy and financial planning
- ☒ Resilience of business model and strategy

(5.1.2.2) Coverage of analysis

Select from:

- ☒ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

Graphic Packaging used a climate scenario analysis to identify substantive physical and transition risks to the organization. This process yielded four potentially material transition risks: Transition to lower emissions technology, Mandates on and regulation of existing products and services, Carbon pricing mechanisms, and Enhanced climate-reporting obligations. Four potentially material physical risks were also identified: Tornadoes, heat stress, cold waves/frost, and heavy precipitation. The results of this analysis will be incorporated into the Company's enterprise risk management process and influence strategic and financial planning cycles. The Company is currently working with site managers at its most exposed sites to develop mitigation and adaptation plans for the most relevant hazards and plan to further quantify potential impacts to the organization.

Water

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- ☒ Risk and opportunities identification, assessment and management

(5.1.2.2) Coverage of analysis

Select from:

☒ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

In all three forward looking modeling scenarios, potential water stress risks are not significant with <1% of the company's water needs potentially sourced from stressed watersheds.

[Fixed row]

(5.2) Does your organization's strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

☒ Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

Select from:

☒ Yes

(5.2.4) Plan explicitly commits to cease all spending on, and revenue generation from, activities that contribute to fossil fuel expansion

Select from:

☒ No, and we do not plan to add an explicit commitment within the next two years

(5.2.6) Explain why your organization does not explicitly commit to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion

We do not see this as being required, as our business activities and investments are not related to fossil fuel expansion. Our plan includes reducing our dependency on fossil fuels over time.

(5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☒ We have a different feedback mechanism in place

(5.2.8) Description of feedback mechanism

Stakeholders are welcome to provide feedback through the Company's website contact us feature. Feedback is also collected through stakeholder engagement meetings.

(5.2.9) Frequency of feedback collection

Select from:

☒ More frequently than annually

(5.2.10) Description of key assumptions and dependencies on which the transition plan relies

The transition plan is based on actions needed to achieve the Company's near-term SBTs. Primary actions include: 1. Increasing renewable biofuel use to 90% in the wood paperboard manufacturing facilities. 2. Achieving 50% purchased renewable electricity use. 3. Engaging suppliers to reduce GHG emissions associated with purchased materials. 4. Reducing transportation emissions. 5. Increasing recyclability and compostability of packaging products at end-of-life. Plan assumes attractive, commercially viable renewable electricity power purchase projects will be available during our timeline, suppliers will cooperate to reduce their emissions, and that external advocacy efforts will increase access and recovery of paperboard packaging materials.

(5.2.11) Description of progress against transition plan disclosed in current or previous reporting period

In 2024 we formalized our aspiration to achieve net zero emissions by 2050 and continued to advance our decarbonization efforts. 2024 Scope 1 and 2 emissions (excluding the sale of the Augusta facility) remained slightly higher than the 2021 baseline. This was expected, as we forecasted our operations emissions to remain relatively flat over the next few years and then decrease rapidly after we complete the recycled paperboard optimization program and begin to implement renewable VPPA projects and the renewable biofuel capital projects. The increase was due to using a higher percentage of fossil fuel in the wood-based paperboard manufacturing facilities combined with increased purchased grid electricity due to equipment downtime. An observed growth in Scope 3 SBT emissions versus the 2021 baseline was mainly due to inventory methodology improvements and a shift to using more accurate, activity-based data to measure our Scope 3 footprint. We plan to review and restate our 2021 baseline next year to reflect the sale of the Augusta facility and our updated Scope 3 measurement approach to enable better progress tracking for achieving our 2032 reduction targets. Read more in the 2024 Impact Report at: <https://www.graphicpkg.com/sustainability/sustainability-reporting/>

(5.2.12) Attach any relevant documents which detail your climate transition plan (optional)

(5.2.13) Other environmental issues that your climate transition plan considers

Select all that apply

- ☒ Forests
- ☒ Water

(5.2.14) Explain how the other environmental issues are considered in your climate transition plan

Water: Our ongoing recycled paperboard manufacturing platform optimization program (including opening a new state-of-the-art recycled paperboard manufacturing facility in Waco, Texas, and decommissioned older, less efficient operations) is projected to decrease water intensity of our recycled paperboard manufacturing by approximately 45% relative to 2021 operations when the platform optimization work is completed. Other energy efficiency programs also have the potential to reduce water use. Forests: Our climate transition plan includes efforts to increase our products' recyclability and through value chain partnerships that expand community access to recycling, which in turn enables us to recover more of our packaging material for reuse. All of these efforts to increase the circularity of wood products put less demand and pressure on wood supply. Additionally, as part of our new 2030 Sustaining Forests goal made in conjunction with our climate transition plan, Graphic Packaging is working to implement consistent, sustainable purchasing practices for all forest-derived products such as external purchased board and secondary packaging materials. In doing so, we are increasing visibility into our global supply chains and advancing efforts to reach a zero-deforestation supply chain.
[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

- ☒ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

- ☒ Products and services
- ☒ Upstream/downstream value chain
- ☒ Investment in R&D
- ☒ Operations

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- ☒ Climate change
- ☒ Forests

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Graphic Packaging manufactures and sells paperboard packaging that is made using renewable wood-fiber materials, and most packaging formats can be recycled. Our customers have set sustainability targets to increase their use of recyclable packaging, increase recycled content in their packaging, reduce the carbon footprint of their purchased packaging, and eliminate deforestation in their supply chains. We address these expectations by integrating sustainability thinking throughout our product innovation process using a Design for the Environment (DfE) approach. With DfE, we consider how to reduce or remove environmental impacts throughout a package's entire life-cycle – from the materials we use, throughout the manufacturing process, and ultimately package end-of-life fate. This informs our sustainability and business strategy and the goals we set to grow our company as we think about maximizing future opportunities and minimizing risk. Our 2030 sustainability goals are designed to address climate risks and opportunities by: • Developing packaging that is more circular, more functional, and more convenient, • Reducing Scope 1&2 GHG emissions through increasing biofuel use in paperboard manufacturing facilities to 90% and purchased renewable electricity to 50%. • Reducing Scope 3 GHG emissions through increasing use of renewable or recycled raw materials, partnering with suppliers to decrease GHG emissions of purchased goods, and to increase the recyclability and/or compostability end fate for our products • Ensuring 100% of purchased forest products are sustainably sourced. These actions will improve the circularity of our packaging products by reducing exposure risks to carbon taxes, EPR fees, and other regulatory requirements while seizing opportunities to grow market share through better packaging that is more circular, more functional, more convenient and made primarily with sustainably sourced wood fiber and pre- and post-consumer recovered fiber. For example, in 2024 over 1 billion plastic packages were replaced with the Company's paperboard solutions.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- ☒ Climate change
- ☒ Forests

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Graphic Packaging manufactures and sells paperboard packaging that is made using renewable wood-fiber materials, and most packaging formats can be recycled. Our customers have set sustainability targets to increase their use of recyclable packaging, increase recycled content in their packaging, reduce the carbon footprint of their purchased packaging, and eliminate deforestation in their supply chains. Our 2030 sustainability goals are designed to address climate risks and opportunities by: • Developing packaging that is more circular, more functional, and more convenient, • Reducing Scope 1&2 GHG emissions through increasing biofuel use in paperboard manufacturing facilities to 90% and purchased renewable electricity to 50%. • Reducing Scope 3 GHG emissions through increasing use of renewable or recycled raw materials, partnering with suppliers to decrease GHG emissions of purchased goods, and to increase the recyclability and/or compostability end fate for our products • Ensuring 100% of purchased forest products are sustainably sourced. These actions will improve the circularity of our packaging products by reducing exposure risks to carbon taxes, EPR fees, and other regulatory requirements while seizing opportunities to grow market share through better packaging that is more circular, more functional, more convenient and made primarily with sustainably sourced wood fiber. Graphic Packaging continues to engage in research and development activities that seek to identify technologies that would allow for alternative packaging for liquid and food products to replace plastic. Additionally, we seek to invest resources and collaborate in research and development for, or externally source new technologies that could be utilized in our manufacturing processes to be more efficient. In 2024, the team delivered approximately \$200 million in new product innovation revenue growth. New product innovations included more circular products with improved recyclability performance and other enhanced performance attributes.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Graphic Packaging manufactures and sells paperboard packaging that is made using renewable wood-fiber materials, and most packaging formats can be recycled. Our customers have set sustainability targets to increase their use of recyclable packaging, increase recycled content in their packaging, reduce the carbon footprint of their purchased packaging, and eliminate deforestation in their supply chains. We address these expectations by integrating sustainability thinking throughout our product innovation process using a Design for the Environment (DfE) approach. With DfE, we consider how to reduce or remove environmental impacts throughout a package's entire life-cycle – from the materials we use, through manufacturing, and ultimately package end-of-life fate. This informs our sustainability and business strategy and the goals we set to grow our company and how we think about maximizing future opportunities and minimizing risk. Our 2030 sustainability goals are designed to address climate risks and opportunities by: •Developing packaging that is more circular, more functional, and more convenient, • Reducing Scope 1&2 GHG emissions through increasing biofuel use in paperboard manufacturing facilities to 90% and purchased renewable electricity to 50%. •Reducing Scope 3 GHG emissions through increasing use of renewable or recycled raw materials, and to increase the recyclability and/or compostability end fate for our products •Ensuring 100% of purchased forest products are sustainably sourced. These actions will improve the circularity of our packaging products by reducing exposure risks to carbon taxes, EPR fees, and other regulatory requirements while seizing opportunities to grow market share through better packaging that is more circular, more functional, more convenient and made primarily with sustainably sourced wood fiber and pre- and post-consumer recovered fiber. Graphic Packaging continues to engage in research and development activities that seek to identify technologies that would allow for alternative packaging for liquid and food products to replace plastic. Additionally, we seek to invest resources and collaborate in research and development for, or externally source new technologies that could be utilized in our manufacturing processes to be more efficient. In 2024, the team delivered approximately \$200 million in new product innovation revenue growth. New product innovations included more circular products with improved recyclability performance, lower LDPE usage, and other enhanced performance attributes.

Operations

(5.3.1.1) Effect type

Select all that apply

☒ Risks

☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Graphic Packaging manufactures and sells paperboard packaging that is made using renewable wood-fiber materials, and most packaging formats can be recycled. Our customers have set sustainability targets to increase their use of recyclable packaging, increase recycled content in their packaging, reduce the carbon footprint of their purchased packaging, and eliminate deforestation in their supply chains. We address these expectations by integrating sustainability thinking throughout our product innovation process using a Design for the Environment (DfE) approach. With DfE, we consider how to reduce or remove environmental impacts throughout a package's entire life-cycle – from the materials we use, through manufacturing, and ultimately package end-of-life fate. This informs our sustainability and business strategy and the goals we set to grow our company, and we think about maximizing future opportunities and minimizing risk. Our 2030 sustainability goals are designed to address climate risks and opportunities by:

- Developing packaging that is more circular, more functional, and more convenient,*
- Reducing Scope 1&2 GHG emissions through increasing biofuel use in paperboard manufacturing facilities to 90% and purchased renewable electricity to 50%.*
- Reducing Scope 3 GHG emissions through increasing use of renewable or recycled raw materials, partnering with suppliers to decrease GHG emissions of purchased goods, and to increase the recyclability and/or compostability end fate for our products*
- Ensuring 100% of purchased forest products are sustainably sourced.*

Our operations strategy to address climate and forest risks/opportunities comes to life through investments to improve recycled paperboard manufacturing, driving energy efficiency in our operations, and optimizing use of forest resources. Region operations sustainability managers are developing and prioritizing energy efficiency improvement opportunities, including (a) using engineering software solutions to help optimize the energy balance within paperboard facilities and identify improvement opportunities to lower energy use, and (b) upgrading equipment to newer, more resource efficient alternatives and using more efficient motors and pumps. This helps protect our company against risks such as rising energy prices and carbon taxes, and positions us to realize business opportunities with customers focused on reducing their supply chain carbon footprint.

[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

- ☒ Revenues
- ☒ Direct costs
- ☒ Capital expenditures
- ☒ Capital allocation

(5.3.2.2) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- ☒ Climate change
- ☒ Forests

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Graphic Packaging evaluates how revenues, costs, and investment needs are impacted by climate and forest-related risks and opportunities in relation to our organization's business, strategy, and financial planning. For example, our Company's R&D team works directly with sales, marketing, and consumer insights to understand long-term consumer and retailer trends and target R&D investments to support bringing relevant new packaging innovations to market. These innovative solutions provide customers with differentiated packaging to meet their sustainability objectives and address broader consumer preferences. The Company's development efforts include but are not limited to: extending the shelf life of customers' products; reducing production costs; enhancing the heat-managing characteristics of food packaging; improving the sturdiness and compression strength of packaging to meet store display needs; and refining packaging appearance through new printing techniques and materials. Circular economy business models and packaging waste reduction represents one of the strongest trends in the packaging industry and the Company focuses on developing more sustainable manufacturing processes and products. In 2024, the team delivered approximately \$200 million in new product innovation revenue growth attributed to new packaging solutions that are more circular than the plastic package alternative. New product innovations included more circular products with improved recyclability performance and other enhanced performance attributes. We address operations needs through our long-range financial planning process to invest in technology upgrades that will improve the operational efficiency of our operations and reduce our reliance on fossil fuels. Examples include the recycle paperboard manufacturing optimization program and projects to increase biofuel use in wood paperboard manufacturing. We also support supplier engagement efforts to ensure continued access to sustainably managed forest product materials. See responses to Q5.3.1 for further information on how environmental risks and opportunities have impacted our capital allocation and capital expenditures in our Operations, and for information on how climate impacts within our supply chain, have impacted costs and availability of certain raw materials.

[Add row]

(5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition
	Select from: <input checked="" type="checkbox"/> No, but we plan to in the next two years

[Fixed row]

(5.9) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

(5.9.1) Water-related CAPEX (+/- % change)

0

(5.9.2) Anticipated forward trend for CAPEX (+/- % change)

0

(5.9.3) Water-related OPEX (+/- % change)

0

(5.9.4) Anticipated forward trend for OPEX (+/- % change)

0

(5.9.5) Please explain

Graphic Packaging's CAPEX was slightly higher in the reporting year (2024) compared to the previous reporting year (2023). This is mainly due to the investment in the new Waco recycled paperboard manufacturing facility. Major water-related investments were flat year over year.

[Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

(5.10.1) Use of internal pricing of environmental externalities

Select from:

☒ No, but we plan to in the next two years

(5.10.3) Primary reason for not pricing environmental externalities

Select from:

☒ No standardized procedure

(5.10.4) Explain why your organization does not price environmental externalities

Currently, the uncertainty in the future of US carbon reduction regulations and lack of global harmonization for carbon emission reduction requirements makes it difficult to set a credible internal price on carbon or other environmental externalities.

[Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Forests
Smallholders	Select from:	Select all that apply

	Engaging with this stakeholder on environmental issues	Environmental issues covered
	<input checked="" type="checkbox"/> Yes	
Customers	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Forests
Investors and shareholders	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Forests
Other value chain stakeholders	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Forests

[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

Climate change

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☒ No, we do not currently assess the dependencies and/or impacts of our suppliers, but we plan to do so within the next two years

Forests

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

- ☒ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

- ☒ Basin/landscape condition
- ☒ Impact on deforestation or conversion of other natural ecosystems
- ☒ Other, please specify :Logging impact on water quality of nearby water bodies

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

- ☒ Unknown

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

At present, we define all wood suppliers as having substantive potential impacts and conduct risk assessments on 100% of these suppliers. We are still working on defining our updated methodology for classifying substantive dependencies and/or impacts for all other purchased forest product categories, and plan to have this defined in 1-2 years. Currently we evaluate the potential impacts of our wood suppliers through risk assessments.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

- ☒ Unknown

[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

- ☒ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

- ☒ Material sourcing
☒ Procurement spend
☒ Product lifecycle
☒ Strategic status of suppliers

(5.11.2.4) Please explain

At present, we have prioritized climate engagements with our raw material suppliers based on magnitude of GHG emissions associated with the commodities we purchase, which in most cases is correlated with our larger spends and/or strategic raw materials.

Forests

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

- ☒ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

- ☒ Business risk mitigation
☒ Material sourcing
☒ Procurement spend
☒ Supplier performance improvement

(5.11.2.4) Please explain

At present, we have prioritized engaging our wood suppliers due to wood being a critical raw material for our operations with a high potential risk. We therefore use a due diligence system that minimizes the risk. The process for monitoring other purchased forest product suppliers is being developed.

[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

	Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process	Policy in place for addressing supplier non-compliance
Climate change	<i>Select from:</i> <input checked="" type="checkbox"/> Yes, environmental requirements related to this environmental issue are included in our supplier contracts	<i>Select from:</i> <input checked="" type="checkbox"/> Yes, we have a policy in place for addressing non-compliance
Forests	<i>Select from:</i> <input checked="" type="checkbox"/> Yes, environmental requirements related to this environmental issue are included in our supplier contracts	<i>Select from:</i> <input checked="" type="checkbox"/> Yes, we have a policy in place for addressing non-compliance

[Fixed row]

(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☒ Other, please specify :Supplier should reduces emissions to air, water, and soil and is expected to measure their environmental performance, set targets to reduce their impact, transparently report their progress, and be willing to share their progress.

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☒ No mechanism for monitoring compliance

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☒ 100%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:

☒ 100%

(5.11.6.12) Comment

Percent suppliers in compliance is unknown at this time. Graphic Packaging will be developing a process to track supplier compliance over the next two years.

Forests

(5.11.6.1) Environmental requirement

Select from:

☒ Other, please specify :No deforestation or conversion of forest resources; use of best management practices during harvest activities

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☒ Supplier scorecard or rating

☒ Other, please specify :Field audits conducted by Graphic Packaging wood procurement team

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☒ 1-25%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☒ 1-25%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☒ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Unknown

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Providing information on appropriate actions that can be taken to address non-compliance

(5.11.6.12) Comment

At present, we define all wood suppliers as having substantive potential impacts, and conduct risk assessments on 100% of these suppliers. We flag any areas of concern from these assessments and issue corrective actions, giving suppliers an opportunity to improve a risk area. If persistent issues occur that are not resolved, we will reassess using the supplier. We are evolving our practices to engage and monitor supplier compliance with remaining forest products suppliers.

[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

- ☒ No other supplier engagement

Forests

(5.11.7.1) Commodity

Select from:

- ☒ Timber products

(5.11.7.2) Action driven by supplier engagement

Select from:

- ☒ Other, please specify :engage wood suppliers on maintenance of water quality, effective land use management

(5.11.7.3) Type and details of engagement

Capacity building

- ☒ Provide training, support and best practices on how to mitigate environmental impact

Information collection

- ☒ Collect environmental risk and opportunity information at least annually from suppliers

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

- ☒ 1-25%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

For purchased wood, Graphic Packaging is working directly with applicable Tier 1 suppliers, who are working with landowners, to support and improve the landowners' capacity to implement and deliver on our forest sustainability commitments, as well as generally expand practices that sustain and conserve the forests and communities we rely on. In the states in which we operate, we are active members of the SFI State Implementation Committee (SIC), through which we support and encourage logger training and landowner outreach and engagement. We also contractually require these trainings for suppliers that deliver wood fiber to our facilities. We conduct periodic audits, engage them in customer tours and educational programs. Landowner engagement and education includes the circulation of informational packets as well as workshops and events to expand their understanding of conservation practices and priorities and encourage management action on the ground. Similarly, the Company partners with the Forest Stewards Guild and Alabama Georgia Land Trust, to engage smallholders in working forest conservation through the establishment of long-term conservation easements, ensuring forests remain in forest use. This engagement helps us understand the efficacy of our logger training and other methods. Because BMPs are demonstrated to protect water quality and other values, this engagement helps give us the assurance that impacts to water quality are minimized by those delivering furnish to our paperboard manufacturing facilities.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☒ Yes, please specify the environmental requirement :Effective land use management and water quality maintenance

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☒ Yes

[Add row]

(5.11.8) Provide details of any environmental smallholder engagement activity

Row 1

(5.11.8.1) Commodity

Select from:

☒ Timber products

(5.11.8.2) Type and details of smallholder engagement approach

Capacity building

- ☒ Disseminate technical materials
- ☒ Organize capacity building events

Other, please specify

- ☒ Other, please specify :We partner with organizations, like Forest Stewards Guild, that specialize in smallholder outreach and conservation. They use various methods, like direct mail, workshops, events and material distribution.

(5.11.8.4) Effect of engagement and measures of success

Graphic Packaging and the communities that we operate in rely on a vibrant forest system. For wood sourcing we engage with consultants, the community, suppliers and other stakeholders to promote forest conservation and stewardship. Our engagement with smallholders is primarily through loggers and land managers, who circulate educational materials and promote educational workshops, developed through regional collaboratives. We also partner with the Forest Stewards Guild to engage landowners around specific conservation priorities in our sourcing basins including restoration of native longleaf pine ecosystems and late successional bottomland hardwoods. We also support the American Tree Farm System, which engages family landowners, who own nearly 40% of forests in the US, and provides the tools they need to be effective stewards of the land, including forest land retention in the context of competing land uses. Similarly, the Company partners with the Alabama Georgia Land Trust, to engage smallholders in working forest conservation through the establishment of long-term conservation easements, ensuring forests remain in forest use. It is not possible to quantify number of small holders engaged as engagement is primarily conducted through third parties.

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

- ☒ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services

- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Many customers have set ambitious packaging and decarbonization targets and are looking to their packaging suppliers to provide packaging made using renewable and/or recycled content and with lower carbon footprints. We engage with customers to collaborate on innovating new packaging options to help them meet their targets and to provide them with information to help them report progress on their goals. We are engaged with our customers in Europe to develop standards for design for recyclability criteria, and are on the review committee for the AF&PA Design Guidance Working Group 2.0 for defining industry terms and definitions. We also provide information on our progress through publishing and sharing our annual ESG report, our CDP responses, and related Sustainability materials. We participate in customer meetings to provide further information as needed, and respond to customer information requests on these topics. We equip our sales teams with tools to discuss our sustainability program with our customers, as well as the environmental impacts and benefits of our products, our decarbonization initiatives, and our relevant certification schemes. Finally, we host customer training events, called Carton College, where we provide customers with educational materials on a variety of topics, including our environmental initiatives and achievements, environmental attributes of the products, certification schemes, etc.

(5.11.9.6) Effect of engagement and measures of success

Effect of engagement is customer education, product awareness and growth opportunities for both Graphic Packaging and the customer. Measures of success include tracking annual revenue growth for new product innovations and feedback through annual customer voice of customer surveys.

Forests

(5.11.9.1) Type of stakeholder

Select from:

- ☒ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements
- ☒ Other education/information sharing, please specify :Customer forest tours

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Many customers have set ambitious targets to eliminate deforestation in their supply chains and are looking to their packaging suppliers to provide packaging made using sustainably sourced fiber materials. We engage with customers to provide them with sourcing and fiber certification information to help them report progress on their goals. We also provide information on our progress through publishing and sharing our annual Impact report, our CDP responses, and related Sustainability materials. In 2024, the Company updated its deforestation policy and worked to set the foundation for complying with European Deforestation-free products regulation (EUDR). We participate in customer meetings to provide further information as needed, and respond to customer information requests on these topics. We equip our sales teams with tools to discuss our sustainability program with our customers, as well as the environmental impacts and benefits of our products, our decarbonization initiatives, and our relevant certification schemes. Finally, we host customer training events, called Carton College, where we provide customers with educational materials on a variety of topics, including our environmental initiatives and achievements, environmental attributes of the products, certification schemes, etc.

(5.11.9.6) Effect of engagement and measures of success

Effect of engagement is education, awareness, and growth opportunities for both Graphic Packaging and the customer. Measures of success include rates for completing customer fiber certification information requests and feedback through annual customer voice of customer surveys.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information about your products and relevant certification schemes

☒ Share information on environmental initiatives, progress and achievements

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Many of our investors incorporate various sustainability and stewardship metrics into their stock selection process and/or manage specific sustainability and ESG targeted funds and are looking to better understand the climate-related practices and performance of the companies they hold in those investments. We engage with our investors by publishing and sharing our annual ESG report, our CDP responses, and related Sustainability materials. We participate in investor meetings and

respond to questionnaires to provide further information as needed. Finally, we periodically host an Investor Day where we share information on our environmental initiatives, among other topics.

(5.11.9.6) Effect of engagement and measures of success

Effect of engagement is education and awareness of Graphic Packaging environmental programs and progress. Measures of success include stable and long-term ownership and/or growth in investor demand for GPK stock in sustainability impact and other ESG-related investment funds.

Forests

(5.11.9.1) Type of stakeholder

Select from:

☒ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information about your products and relevant certification schemes

☒ Share information on environmental initiatives, progress and achievements

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Many of our investors incorporate various sustainability and stewardship metrics into their stock selection process and/or manage specific sustainability and ESG targeted funds and are looking to better understand the deforestation practices and performance of the companies they hold in those investments. We engage with our investors by publishing and sharing our annual ESG report, our CDP responses, and related Sustainability materials. We participate in investor meetings and respond to questionnaires to provide further information as needed. Finally, we periodically host an Investor Day where we share information on our environmental initiatives, among other topics.

(5.11.9.6) Effect of engagement and measures of success

Effect of engagement is education and awareness of Graphic Packaging environmental programs and progress. Measures of success include stable and long-term ownership and/or growth in investor demand for GPK stock in sustainability impact and other ESG-related investment funds.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify :Industry Groups

(5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Engage with stakeholders to advocate for policy or regulatory change

Other

☒ Other, please specify :Engagement to work with local communities to increase recycling access.

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Graphic Packaging is collaborating with AF&PA, FPI, NextGen, the Paper and Paperboard Association, and other industry groups to increase U.S. community access and recovery rates for paperboard and paper-based packaging materials. Graphic Packaging and the paper industry are actively working with the Paper Cup Alliance, a subgroup of FPI, to increase community awareness and acceptance of paper cup recycling in the U.S. Paper. In Europe, we participate in several initiatives focused on improving the circularity of packaging materials. Participation in CEFLEX, a flexible packaging value chain consortium, helps us in designing our paper and plastic flexible packaging for recycling and improved circularity. We also participate in Compostability by Design Platform, a cross-value chain industry alliance for collaboration and innovation in compostable materials, technologies, and processes, aiming to ensure compostable materials are recycled at scale in Europe. We are also ambassadors and have leading roles in several initiatives sponsored by the 4evergreen Industry Alliance, which includes over 100 members across the European fiber-based packaging value chain. Increasing access to recycle or to compost our packaging at end-of-life will increase circularity and reduce Scope 3 Category 12 end-of-life emissions in addition to supporting our customers in achieving their packaging targets.

(5.11.9.6) Effect of engagement and measures of success

Effective of the engagement and measure of success is increased community access for recycling all forms of paperboard packaging and increased recovery rates of paperboard and paper-based packaging materials in the regions in which we operate.

Forests

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify :Industry Associations

(5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Engage with stakeholders to advocate for policy or regulatory change

☒ Other innovation and collaboration, please specify :Partner to engage with smallholders

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Graphic Packaging and the communities that we operate in rely on a vibrant, sustainably managed forest system. We engage with consultants, the community, suppliers and other stakeholders to promote forest conservation and stewardship. Our engagement with smallholders is primarily through loggers and land managers, who circulate educational materials and promote educational workshops, developed through regional collaboratives. We also partner with the Forest Stewards Guild to engage landowners around specific conservation priorities in our sourcing basins including restoration of native longleaf pine ecosystems and late successional bottomland hardwoods. We also support the American Tree Farm System, which engages family landowners, who own nearly 40% of forests in the US, and provides the tools they need to be effective stewards of the land, including forest land retention in the context of competing land uses. Similarly, Graphic Packaging partners with the Alabama Georgia Land Trust, to engage smallholders in working forest conservation through the establishment of long-term conservation easements, ensuring forests remain in forest use.

(5.11.9.6) Effect of engagement and measures of success

Effective engagement is improved land management and sustainable forest management amongst landowners in our supply region. Measures of success have not been formally developed.

[Add row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Graphic Packaging has selected the operational control approach for the consolidation of all environmental metrics. Under this approach, the Company will account for 100% of the GHG emissions from operations over which it has control. The advantage of an operational control approach is that it focuses on where Graphic Packaging can have direct impact.

Forests

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Graphic Packaging has selected the operational control approach for the consolidation of all environmental metrics. The advantage of an operational control approach is that it focuses on where Graphic Packaging can have direct impact, measure performance, and drive improvements.

Water

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Graphic Packaging has selected the operational control approach for the consolidation of all environmental metrics. The advantage of an operational control approach is that it focuses on where Graphic Packaging can have direct impact, measure performance, and drive improvements.

Plastics

(6.1.1) Consolidation approach used

Select from:

☒ Other, please specify :GPI id not reporting on plastics

(6.1.2) Provide the rationale for the choice of consolidation approach

Graphic Packaging is a paperboard packaging manufacturing company and does not report on plastics through CDP

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Graphic Packaging has selected the operational control approach for the consolidation of all environmental metrics. The advantage of an operational control approach is that it focuses on where Graphic Packaging can have direct impact, measure performance, and drive improvements.

[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:

☒ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

(7.1.1.1) Has there been a structural change?

Select all that apply

☒ Yes, a divestment

(7.1.1.2) Name of organization(s) acquired, divested from, or merged with

Augusta Paperboard Manufacturing Facility

(7.1.1.3) Details of structural change(s), including completion dates

On May 2, 2024, the Company completed the sale of its Augusta, GA paperboard manufacturing facility. The Company will rebaseline emissions in 2025 to adjust for the facility sale and other structural changes to the Company in prior years.

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

☒ Yes, a change in methodology

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

All categories that include spend-based calculations have switched from CEDA Producer Price to Purchaser price emissions factors. Emission factors used to calculate Category 1 emissions for clay has switched from ecoinvent to supplier-specific emission factors. Ecoinvent emission factors applied to roundwood and wood chips in Category 1 were modified by subtracting the emissions associated to transportation. The adjustment was made to avoid double counting emissions because upstream emissions associated with the logistics of these products are already accounted for in Category 4. Category 9 emissions have been added. This category only includes shipments labelled as "customer pickup" in our transportation data. All other emissions from logistics have been included in Category 4. The integration of this category into the FY24 inventory is not material (521 tCO₂e). For Category 3 - Electricity, we transitioned from using IPCC factors to using IEA factors. For Scope 1, we switched from using DEFRA factors to EPA factors for Fuel Oil, Ethanol and Kerosene, as EPA factors showed consistency year-over-year and 100% of these fuels are used in our US sites.

[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

☒ No, because we do not have the data yet and plan to recalculate next year

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

For adjustments to the base year based on structural changes (e.g., mergers, acquisitions, divestitures, and outsourcing), base year emissions will be adjusted only under the following conditions: - The divested/acquired facility or operations is included in the company's operational control boundary. - The divested/acquired operations or facilities result in a significant change (cumulative impact greater than 5% difference) to the total base year emissions due to the divestitures or acquisition. For adjustments to the base year due to methodology changes (e.g., calculation methodologies, emission factors, or error correction), the base year emissions will be adjusted only under the following conditions: - The new emission factors, constants or methodologies result in a significant change (cumulative impact greater than 5% difference) in total base year emissions) - Errors are discovered in previously submitted data that significantly change (cumulative impact greater than 5% difference in total base year emissions) the base year emissions. To align with SBTi guidance, The Company's cumulative significance threshold is

set at 5%. The Company records the impacts of structural changes and inventory changes. If an individual change has an impact lower than 5% but that the cumulative impacts of all changes that have occurred since the previous rebaselining exceed 5%, rebaselining is triggered.

(7.1.3.4) Past years' recalculation

Select from:

☒ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☒ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

☒ The Greenhouse Gas Protocol: Scope 2 Guidance

☒ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

	Scope 2, location-based	Scope 2, market-based	Comment
	Select from: <input checked="" type="checkbox"/> We are reporting a Scope 2, location-based figure	Select from: <input checked="" type="checkbox"/> We are reporting a Scope 2, market-based figure	N/A

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

☒ No

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO₂e)

1604093

(7.5.3) Methodological details

Activity-based calculation using emissions factor databases, such as the DEFRA/BEIS Conversion Factors database, for all direct emissions resulting from activities such as fuel combustion, fugitive emissions, and fugitive refrigerants.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO₂e)

680066

(7.5.3) Methodological details

Activity-based calculation using emissions factor databases, such as the IEA Emissions Factors database and US EPA eGRID database, for all indirect emissions from the use of purchased electricity, district heating, steam, and cooling in operated sites.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

714504

(7.5.3) Methodological details

Activity-based calculation using emissions factor databases, such as the Green-e Residual Mix Emissions Rate Tables, for all indirect emissions from the use of purchased electricity, district heating, steam, and cooling in operated sites.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

3347793

(7.5.3) Methodological details

A combination of volume and spend data was used to estimate global Category 1 emissions for both direct and indirect procurement. Where volume data was available, corresponding emission factors from ecoinvent v3.8 were used. Where only spend data was available, corresponding emission factors from the CEDA 6 EEIO database were used to estimate emissions.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

(7.5.3) Methodological details

Spend data was used to estimate global Category 2 emissions. Corresponding emission factors from CEDA 6 EEIO database were matched to capital goods spend descriptions and multiplied by total spend amounts to estimate emissions.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)**(7.5.1) Base year end**

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

506292

(7.5.3) Methodological details

Scope 1 and 2 consumption data was used to estimate Category 3 emissions. WTT emissions from the use of fuels in Scope 1 were calculated using energy usage (kWh) from each fuel source along with corresponding well-to-wheel (WTT) emission factors from the DEFRA/BEIS Conversion Factors 2021 database. In Scope 2, purchased electricity consumption was multiplied by corresponding WTT and T&D generation emissions factors from the IEA (2021). District heating and cooling consumption was multiplied by the WTT generation and distribution losses emissions factors for district heating from the DEFRA/BEIS Conversion Factors 2021 database.

Scope 3 category 4: Upstream transportation and distribution**(7.5.1) Base year end**

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

552442

(7.5.3) Methodological details

Spend-based data was used to estimate global Category 4 emissions. Total spend for every logistics spend category (truck freight, rail freight, warehousing, etc.) was multiplied by emission factors from CEDA 6 EEIO database to calculate total logistics emissions.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

179739

(7.5.3) Methodological details

Waste amount, type, and disposal methods were collected across Graphic Packaging global sites. Waste data was mapped to waste types present in the EPA 2021 Emission Factor Hub and the DEFRA/BEIS Conversion Factors 2021 database. Corresponding emissions factors from the database were used to calculate emissions from the quantity of material and treatment pathway.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

4035

(7.5.3) Methodological details

A combination of distance and spend data was used to estimate global Category 6 emissions. Where distance data was available, supplier specific emissions factors or well-to-wheel (WTW) emission factors from the DEFRA/BEIS Conversion Factors 2021 database were used to estimate emissions. Where only spend data was available, corresponding emission factors from the CEDA 6 EEIO database were used to estimate emissions. Per request from the Science Based Targets Initiative on our emissions data, hotel data was excluded from this Scope 3 category.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

30339

(7.5.3) Methodological details

Total global headcount (including remote work status and estimated annual days) was used to estimate commuting mode and distance data using country-specific travel benchmarks. Total distance for various transportation methods was multiplied by corresponding well-to-wheel (WTW) emission factors from the DEFRA/BEIS Conversion Factors 2021 database or the EPA's 2021 Emission Factor Hub (for US employees) to estimate emissions.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

83634

(7.5.3) Methodological details

A combination of primary utility data and spend data was used to calculate upstream leased asset emissions. Primary utility data was used to calculate emissions where available for leased sites in North America by multiplying electricity/natural gas consumption by corresponding emission factors from eGRID, the IEA, and DEFRA. The average electricity/natural gas consumption per square foot at offices in North America with primary utility data was used to estimate the consumption at the remaining North America office sites. For warehouse sites and offices located outside of the US, a spend-based calculation was performed by matching emission factors from the CEDA 6 EEIO database to each activity.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Graphic Packaging pays for all downstream transportation of sold products, as such this Scope 3 category is not relevant.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

145115

(7.5.3) Methodological details

This category estimates the total emissions associated with processing of board that Graphic Packaging sells to other companies to be converted into finished packaging products. The processing of sold board is assumed to have a very similar emissions footprint as Graphic Packaging's own board processing. Thus, a proxy emissions factor was developed for estimating emissions by dividing the Company's total 2021 US & Canada packaging facility (market-based) Scope 1 & 2 GHG emissions by the Company's total 2021 US & Canada converted board (tonnes). Total unprocessed board (tonnes) sold by Graphic Packaging is multiplied by this Graphic Packaging North America specific emissions factor to estimate total Category 10 emissions.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

31568

(7.5.3) Methodological details

This category estimates the total direct use phase emissions resulting from sold packaging machines that use electricity during their operating life. Average lifetime energy consumptions of each sold machine were estimated and collated by the country in which they operate. Total Category 11 emissions were then calculated by multiplying total energy consumptions by a corresponding US average emission factor.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1560554

(7.5.3) Methodological details

A combination of mass and revenue data was used to estimate global Category 12 emissions. End-of-Life treatment pathways were assumed based on publicly available sources, (e.g., recycling rates from the American Forest & Paper Association). Emissions factors from the EPA 2021 Emission Factor Hub were used to calculate emissions from the quantity of material and treatment pathway.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Graphic Packaging does not operate as a lessor for any assets and as such this Scope 3 category is not relevant.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Graphic Packaging does not operate any franchises and as such this Scope 3 category is not relevant.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

6764

(7.5.3) Methodological details

This category estimates the total emissions associated with Graphic Packaging's joint ventures using similar Graphic Packaging facilities as proxies.

Scope 3: Other (upstream)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Graphic Packaging has no other upstream emissions to report.

Scope 3: Other (downstream)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Graphic packaging has no other downstream emissions to report.
[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1351098

(7.6.3) Methodological details

Activity-based calculation using emissions factor databases, such as the DEFRA/BEIS Conversion Factors database, for all direct emissions resulting from activities such as fuel combustion, fugitive emissions, and fugitive refrigerants.
[Fixed row]

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

691110

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

742715

(7.7.4) Methodological details

Activity-based calculation using emissions factor databases, such as the IEA Emissions Factors database, US EPA eGRID database, and Green-e Residual Mix Emissions Rate Tables, or from utility-provided emissions factors, for all indirect emissions from the use of purchased electricity, district heating, steam, and cooling in operated sites.
[Fixed row]

(7.8) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

(7.8.3) Emissions calculation methodology

Select all that apply

- ☒ Supplier-specific method
- ☒ Average data method
- ☒ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

1.2

(7.8.5) Please explain

A combination of volume and spend data was used to estimate global Category 1 emissions for both direct and indirect procurement. Where volume data was available, corresponding emission factors from ecoinvent v3.11 were used to estimate emissions. Ecoinvent emission factors applied to roundwood and wood chips were modified by subtracting the emissions associated to transportation. The adjustment was made to avoid double counting emissions because upstream emissions associated with the logistics of these products are already accounted for in Category 4. Supplier-specific LCAs were obtained from Graphic Packaging's clay supplier and applied to the procured clay. Where only spend data was available, corresponding emission factors from the CEDA 2024 EEIO database were used to estimate emissions.

Capital goods

(7.8.1) Evaluation status

Select from:

- ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

316631

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Spend data was used to estimate global Category 2 emissions. Corresponding emission factors from the CEDA 2024 EEIO database were matched to capital goods spend descriptions and multiplied by total spend amounts to estimate emissions.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

382814

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Scope 1 and 2 consumption data was used to estimate Category 3 emissions. WTT emissions from the use of fuels in Scope 1 were calculated using energy usage (kWh) from each fuel source along with corresponding well-to-wheel (WTT) emission factors from a variety of databases, such as the DEFRA/BEIS Conversion

Factors 2024 database. In Scope 2, purchased electricity consumption was multiplied by corresponding WTT and T&D generation emissions factors from a variety of databases, such as the IEA (2024). District heating and cooling consumption was multiplied by the WTT generation and distribution losses emissions factors as well.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:
☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

982276

(7.8.3) Emissions calculation methodology

Select all that apply
☒ Spend-based method
☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

A combination of shipping (inclusive of distance & weight) and spend data was used to estimate global Category 4 emissions. For regions, products, and/or modes of transport for which distance and weight for each shipment was available, the distance-based method was used along with well-to-wheel (WTW) emission factors from the DEFRA/BEIS Conversion Factors 2024 database. All other relevant Category 4 emissions were estimated using spend data and corresponding emission factors from the CEDA 2024 EEIO database.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

156434

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Waste amount, type, and disposal methods were collected across the Company's global sites. Waste data was mapped to waste types present in the EPA 2024 Emission Factor Hub, ecoinvent v3.11 emission factors, and DEFRA/BEIS Conversion Factors 2024 databases. Corresponding emissions factors from such databases were used to calculate emissions from the quantity of material and treatment pathway

Business travel

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

5425

(7.8.3) Emissions calculation methodology

Select all that apply

- ☒ Supplier-specific method
- ☒ Spend-based method
- ☒ Fuel-based method
- ☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

21

(7.8.5) Please explain

A combination of fuel, distance, and spend data was used to estimate global Category 6 emissions. Where distance data was available, corresponding well-to-wheel (WTW) emission factors from the DEFRA/BEIS Conversion Factors 2024 database were used to estimate emissions. Where only spend data was available, corresponding emission factors from the CEDA 2024 EEIO database (adjusted for country-level inflation) were used to estimate emissions. As fuel data was only available in the case of private jet use, a supplier-specific fuel-based emission factor was provided and used by the jet provider. Hotel emissions were excluded per request from the Science Based Targets Initiative to be consistent with Graphic Packaging's 2021 base year inventory.

Employee commuting

(7.8.1) Evaluation status

Select from:

- ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

35944

(7.8.3) Emissions calculation methodology

Select all that apply

- ☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Total global headcount (including remote work status and estimated annual days) was used to estimate commuting mode and distance data using country-specific travel benchmarks. Total distance for various transportation methods was multiplied by corresponding well-to-wheel (WTW) emission factors from the DEFRA/BEIS Conversion Factors 2024 database to estimate emissions. For employees in the United States, tank-to-wheel (TTW) emission factors obtained from the EPA's 2024 Emission Factor Hub were used in place of TTW DEFRA emissions factors

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

39288

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Certain sites provided utility data, including natural gas and electricity consumption. For sites that did not have available utility data, total natural gas usage and electricity usage was estimated per leased site by site type-specific benchmarks from the EIA. For electricity usage, total consumption was multiplied by corresponding emission factors from eGRID 2022 for the US, Canada National Inventory Report (2024) for Canada, and IEA (2024) for all other countries to estimate total emissions. For natural gas, total consumption was multiplied by the corresponding emission factor from the DEFRA/BEIS Conversion Factors 2024 database

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

521

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Shipping (inclusive of distance & weight) data was used to estimate Category 9 emissions. For regions, products, and/or modes of transport for which distance and weight for each shipment was available, the distance-based method was used along with well-to-wheel (WTW) emission factors from the DEFRA/BEIS Conversion Factors 2024 database.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

(7.8.3) Emissions calculation methodology*Select all that apply*☒ Average data method**(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners**

0

(7.8.5) Please explain

This category estimates the total emissions associated with processing of board that Graphic Packaging sells to other companies to be converted into finished packaging products. The processing of sold board is assumed to have a very similar emissions footprint as the Company's own board processing. Thus, a proxy emissions factor was developed for estimating emissions by dividing Graphic Packaging's total 2023 US and Canada (market-based) Scope 1 and 2 GHG emissions by Graphic Packaging's total 2022 US and Canada converted board (tonnes). Total 2024 unprocessed board (tonnes) sold by the Company is multiplied by this Graphic Packaging North America specific emissions factor to estimate total Category 10 emissions.

Use of sold products**(7.8.1) Evaluation status***Select from:*☒ Relevant, calculated**(7.8.2) Emissions in reporting year (metric tons CO2e)**

9477

(7.8.3) Emissions calculation methodology*Select all that apply*☒ Methodology for direct use phase emissions, please specify**(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners**

(7.8.5) Please explain

This category estimates the total direct use phase emissions resulting from sold packaging machines that use electricity during their operating life. Average lifetime energy consumptions of each sold machine were estimated and collated by the country and region in which they operate. Total Category 11 emissions were then calculated by multiplying total energy consumptions by corresponding regional/country-specific electricity emission factors from eGRID 2022 for the US, Canada National Inventory Report (2024) for Canada, and the IEA (2024) for all other countries.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1535088

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

A combination of mass and revenue data was used to estimate global Category 12 emissions. End-of-Life treatment pathways were assumed based on publicly available sources, (e.g., recycling rates from the American Forest & Paper Association). Emissions factors from the EPA 2024 Emission Factors Hub were used to calculate emissions from the quantity of material and treatment pathway.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

No downstream assets were leased by Graphic Packaging in the reporting year.

Franchises

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Graphic Packaging does not operate any franchises.

Investments

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

7242

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

This category estimates the total emissions associated with Graphic Packaging's joint ventures using similar Graphic Packaging facilities as proxies.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Graphic Packaging has no other upstream emissions to report.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Graphic packaging has no other downstream emissions to report.

[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 3	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.1.2) Status in the current reporting year

Select from:

☒ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.1.4) Attach the statement

GPI CY2024 Assurance Statement.pdf

(7.9.1.5) Page/section reference

1-2

(7.9.1.6) Relevant standard

Select from:

☒ ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

100

[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☒ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☒ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.2.5) Attach the statement

GPI CY2024 Assurance Statement.pdf

(7.9.2.6) Page/ section reference

1-2

(7.9.2.7) Relevant standard

Select from:

☒ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:

☒ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☒ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.2.5) Attach the statement

GPI CY2024 Assurance Statement.pdf

(7.9.2.6) Page/ section reference

1-2

(7.9.2.7) Relevant standard

Select from:

☒ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

- ☒ Scope 3: Investments
- ☒ Scope 3: Capital goods
- ☒ Scope 3: Business travel
- ☒ Scope 3: Employee commuting
- ☒ Scope 3: Use of sold products
- ☒ Scope 3: Upstream transportation and distribution
- ☒ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)
- ☒ Scope 3: Upstream leased assets
- ☒ Scope 3: Processing of sold products
- ☒ Scope 3: Purchased goods and services
- ☒ Scope 3: Waste generated in operations
- ☒ Scope 3: End-of-life treatment of sold products

(7.9.3.2) Verification or assurance cycle in place

Select from:

- ☒ Annual process

(7.9.3.3) Status in the current reporting year

Select from:

- ☒ Complete

(7.9.3.4) Type of verification or assurance

Select from:

- ☒ Limited assurance

(7.9.3.5) Attach the statement

GPI CY2024 Assurance Statement.pdf

(7.9.3.6) Page/section reference

1-2

(7.9.3.7) Relevant standard

Select from:

☒ ISO14064-3

(7.9.3.8) Proportion of reported emissions verified (%)

100

[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

☒ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

17333

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

0.7

(7.10.1.4) Please explain calculation

In 2024 a slightly larger portion of our electricity and steam consumption came from grid sources instead of renewable or self-generated sources. Change in emissions was calculated by estimating 2024 emissions if the % from grid sources remained the same as 2023, and subtracting this from actual 2024 emissions.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

32209

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

1.3

(7.10.1.4) Please explain calculation

Scope 1 & 2 reductions from other emissions reductions activities have calculated as part of our response to 7.55.2.

Divestment

(7.10.1.1) Change in emissions (metric tons CO2e)

277565

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

11.3

(7.10.1.4) Please explain calculation

Graphic Packaging divested the Augusta, GA paperboard manufacturing facility in 2024. Change in emissions was calculated by taking the difference between 2024 and 2023 emissions from this site.

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

Mergers

(7.10.1.1) Change in emissions (metric tons CO2e)

0

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

0

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

0

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO2e)

0

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

Unidentified

(7.10.1.1) Change in emissions (metric tons CO2e)

60161

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

2.5

(7.10.1.4) Please explain calculation

All other changes between 2023 and 2024 Scope 1 & 2 emissions have been included here.

[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:

☒ Market-based

(7.13) Is biogenic carbon pertaining to your direct operations relevant to your current CDP climate change disclosure?

Select from:

☒ Yes

(7.13.1) Account for biogenic carbon data pertaining to your direct operations and identify any exclusions.

CO2 emissions from biofuel combustion (processing/manufacturing machinery)

(7.13.1.1) Emissions (metric tons CO2)

4355368.387

(7.13.1.2) Methodology

Select all that apply

☒ Default emissions factors

(7.13.1.3) Please explain

Biogenic carbon dioxide emissions were calculated for bark, black liquor, sludge, and railroad cross ties using the US EPA MRR Final Rule (40 CFR 98) - Industrial Sector 2013 emission factor set based on the energy generated from the combustion of these sources.

CO2 emissions from biofuel combustion (other)

(7.13.1.1) Emissions (metric tons CO2)

1978

(7.13.1.2) Methodology

Select all that apply

☒ Process-based models

(7.13.1.3) Please explain

EPA Greenhouse Gas Reporting program Subpart TT used to estimate biogenic and methane landfill emissions.
[Fixed row]

(7.14) Do you calculate greenhouse gas emissions for each agricultural commodity reported as significant to your business?

Timber products

(7.14.1) GHG emissions calculated for this commodity

Select from:

☒ Yes

(7.14.2) Reporting emissions by

Select from:

☒ Total

(7.14.3) Emissions (metric tons CO₂e)

1529067

(7.14.5) Change from last reporting year

Select from:

☒ Much lower

(7.14.6) Please explain

Company-wide GHG emissions from timber (purchased pulpwood and paperboard) are calculated as part of our Scope 3: Purchased Goods and Services emissions
[Fixed row]

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:

☒ Yes

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:

☒ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

1260145

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:

☒ CH4

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

6678

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:

☒ N2O

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

19184

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 4

(7.15.1.1) Greenhouse gas

Select from:

☒ HFCs

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

9770

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)
[Add row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply
☒ By business division

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

	Business division	Scope 1 emissions (metric ton CO2e)
Row 1	Paperboard Manufacturing	1285003
Row 2	Packaging Manufacturing	65742
Row 3	Other	353

[Add row]

(7.18) Do you include emissions pertaining to your business activity(ies) in your direct operations as part of your global gross Scope 1 figure?

Select from:
☒ Yes

(7.18.2) Report the Scope 1 emissions pertaining to your business activity(ies) and explain any exclusions. If applicable, disaggregate your agricultural/forestry by GHG emissions category.

Row 1

(7.18.2.1) Activity

Select from:

☒ Processing/Manufacturing

(7.18.2.3) Emissions (metric tons CO₂e)

1229619

(7.18.2.4) Methodology

Select all that apply

☒ Default emissions factor

(7.18.2.5) Please explain

The majority of Graphic Packaging's Scope 1 emissions result from activities from paperboard manufacturing operations, which are the core of our processing and manufacturing activities. To calculate the respective emissions, the energy activity is multiplied by standard (default) emission factors.

[Add row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply

☒ By business division

(7.20.1) Break down your total gross global Scope 2 emissions by business division.

	Business division	Scope 2, location-based (metric tons CO ₂ e)	Scope 2, market-based (metric tons CO ₂ e)
Row 1	Paperboard Manufacturing	383885	448336

	Business division	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 2	<i>Packaging Manufacturing</i>	306473	293599
Row 3	<i>Other</i>	752	780

[Add row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO2e)

1351098

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

691110

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

742715

(7.22.4) Please explain

All Scope 1 & 2 emissions for Graphic Packaging are contained in the consolidated accounting group.

All other entities

(7.22.1) Scope 1 emissions (metric tons CO2e)

0

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

0

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

0

(7.22.4) Please explain

*All Scope 1 & 2 emissions for Graphic Packaging are contained in the consolidated accounting group.
[Fixed row]*

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

☒ No

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

☒ More than 0% but less than or equal to 5%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> Yes
Generation of electricity, heat, steam, or cooling	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☒ HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

13556264

(7.30.1.3) MWh from non-renewable sources

6855973

(7.30.1.4) Total (renewable + non-renewable) MWh

20412237.00

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

57085

(7.30.1.3) MWh from non-renewable sources

1678708

(7.30.1.4) Total (renewable + non-renewable) MWh

1735793.00

Consumption of purchased or acquired heat

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

2165

(7.30.1.4) Total (renewable + non-renewable) MWh

2165.00

Consumption of purchased or acquired steam

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

374

(7.30.1.4) Total (renewable + non-renewable) MWh

374.00

Consumption of purchased or acquired cooling

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

7863

(7.30.1.4) Total (renewable + non-renewable) MWh

7863.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.4) Total (renewable + non-renewable) MWh

0.00

Total energy consumption

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

13613349

(7.30.1.3) MWh from non-renewable sources

8545083

(7.30.1.4) Total (renewable + non-renewable) MWh

22158432.00

[Fixed row]

(7.30.6) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of heat	Select from: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of steam	Select from: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of cooling	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for co-generation or tri-generation	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

13556264

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

13556264

(7.30.7.8) Comment

Fuels include bark, biogas, black liquor, railroad crossties, and sludge.

Other biomass

(7.30.7.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

N/A

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

N/A

Coal

(7.30.7.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

N/A

Oil

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

118447

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

118447

(7.30.7.8) Comment

Fuels include diesel, ethanol, fuel oil #2, fuel oil #6, gasoline, and kerosene.

Gas

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

6737525

(7.30.7.3) MWh fuel consumed for self-generation of electricity

32340

(7.30.7.4) MWh fuel consumed for self-generation of heat

239739

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

(7.30.7.8) Comment

Fuels include LPG, natural gas, and propane. Natural gas at packaging facilities is used for heat, electricity, and steam. Unable to quantify exact split, so assumed all used for heat, except at facilities specifically self-generating electricity.

Other non-renewable fuels (e.g. non-renewable hydrogen)**(7.30.7.1) Heating value**

Select from:

☒ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

N/A

Total fuel

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

20412236

(7.30.7.3) MWh fuel consumed for self-generation of electricity

32340

(7.30.7.4) MWh fuel consumed for self-generation of heat

239739

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

20140156

(7.30.7.8) Comment

N/A

[Fixed row]

(7.30.9) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

Electricity

(7.30.9.1) Total Gross generation (MWh)

1482909

(7.30.9.2) Generation that is consumed by the organization (MWh)

1476359

(7.30.9.3) Gross generation from renewable sources (MWh)

1010538

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

1010538

Heat

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Steam

(7.30.9.1) Total Gross generation (MWh)

12854125

(7.30.9.2) Generation that is consumed by the organization (MWh)

12854125

(7.30.9.3) Gross generation from renewable sources (MWh)

9442769

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

9442769

Cooling

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

[Fixed row]

(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.

Row 1

(7.30.14.1) Country/area

Select from:

☒ Indonesia

(7.30.14.2) Sourcing method

Select from:

☒ Project-specific contract with an electricity supplier

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Hydropower (capacity unknown)

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

3069

(7.30.14.6) Tracking instrument used

Select from:

☒ TIGR

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Indonesia

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Physical power purchase agreement – RECs are issued along with the electricity bill. Sourced 100% from hydropower.

Row 2

(7.30.14.1) Country/area

Select from:

☒ Brazil

(7.30.14.2) Sourcing method

Select from:

☒ Physical power purchase agreement (physical PPA) with a grid-connected generator

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

1826

(7.30.14.6) Tracking instrument used

Select from:

☒ I-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Brazil

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Signed PPA in Brazil to cover 100% of electricity over a 5 year period beginning in 2024

Row 3

(7.30.14.1) Country/area

Select from:

☒ Sweden

(7.30.14.2) Sourcing method

Select from:

☒ Project-specific contract with an electricity supplier

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Hydropower (capacity unknown)

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

29875

(7.30.14.6) Tracking instrument used

Select from:

☒ GO

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Sweden

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Three sites in Sweden have purchased GOs to power 100% of their electricity. Sourced 100% from hydropower

Row 4

(7.30.14.1) Country/area

Select from:

☒ Austria

(7.30.14.2) Sourcing method

Select from:

☒ Purchase from an on-site installation owned by a third party (on-site PPA)

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Solar

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

177

(7.30.14.6) Tracking instrument used

Select from:

☒ GO

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Austria

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Graphic Packaging's location in Graz sources a small portion of its electricity from on-site solar panels, and has full claim over retiring the RECs for these panels, per their permit.

Row 5

(7.30.14.1) Country/area

Select from:

☒ Spain

(7.30.14.2) Sourcing method

Select from:

☒ Purchase from an on-site installation owned by a third party (on-site PPA)

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Solar

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

1016

(7.30.14.6) Tracking instrument used

Select from:

☒ GO

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Spain

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

2021

(7.30.14.10) Comment

Solar panel installation with power purchase agreement went live end of 2021 in our Requejada factory (Santander, Spain). On-site solar powered about 25% of site's total electricity usage in 2024.

Row 6

(7.30.14.1) Country/area

Select from:

☒ Germany

(7.30.14.2) Sourcing method

Select from:

☒ Unbundled procurement of energy attribute certificates (EACs)

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Solar

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

4320

(7.30.14.6) Tracking instrument used

Select from:

☒ GO

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Germany

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Graphic Packaging purchased unbundled RECs in 2024 in several regions, including the EU, UK, Mexico and the US. RECs were retired against electricity in each respective region.

Row 7

(7.30.14.1) Country/area

Select from:

☒ Germany

(7.30.14.2) Sourcing method

Select from:

☒ Unbundled procurement of energy attribute certificates (EACs)

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

1105

(7.30.14.6) Tracking instrument used

Select from:

☒ GO

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Germany

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Graphic Packaging purchased unbundled RECs in 2024 in several regions, including the EU, UK, Mexico and the US. RECs were retired against electricity in each respective region.

Row 8

(7.30.14.1) Country/area

Select from:

☒ Mexico

(7.30.14.2) Sourcing method

Select from:

☒ Unbundled procurement of energy attribute certificates (EACs)

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

540

(7.30.14.6) Tracking instrument used

Select from:

☒ I-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Mexico

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Graphic Packaging purchased unbundled RECs in 2024 in several regions, including the EU, UK, Mexico and the US. RECs were retired against electricity in each respective region.

Row 9

(7.30.14.1) Country/area

Select from:

☒ United Kingdom of Great Britain and Northern Ireland

(7.30.14.2) Sourcing method

Select from:

☒ Unbundled procurement of energy attribute certificates (EACs)

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

450

(7.30.14.6) Tracking instrument used

Select from:

☒ REGO

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ United Kingdom of Great Britain and Northern Ireland

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Graphic Packaging purchased unbundled RECs in 2024 in several regions, including the EU, UK, Mexico and the US. RECs were retired against electricity in each respective region.

Row 10

(7.30.14.1) Country/area

Select from:

☒ United States of America

(7.30.14.2) Sourcing method

Select from:

☒ Unbundled procurement of energy attribute certificates (EACs)

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

31320

(7.30.14.6) Tracking instrument used

Select from:

☒ US-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ United States of America

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Graphic Packaging purchased unbundled RECs in 2024 in several regions, including the EU, UK, Mexico and the US. RECs were retired against electricity in each respective region.

[Add row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.000237717

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

2093813

(7.45.3) Metric denominator

Select from:

☒ unit total revenue

(7.45.4) Metric denominator: Unit total

8807000000

(7.45.5) Scope 2 figure used

Select from:

☒ Market-based

(7.45.6) % change from previous year

8

(7.45.7) Direction of change

Select from:

☒ Decreased

(7.45.8) Reasons for change

Select all that apply

☒ Other emissions reduction activities

☒ Divestment

(7.45.9) Please explain

Intensity of emissions per unit of revenue have decreased by 8.4%. This is largely driven by a reduction in Scope 1 and 2 emissions due to the sale of the Augusta paperboard manufacturing facility.

[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☒ Absolute target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☒ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

GPI - Near-Term Approval Letter 2023.pdf

(7.53.1.4) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.1.5) Date target was set

10/05/2023

(7.53.1.6) Target coverage

Select from:

☒ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Methane (CH₄)

☒ Nitrous oxide (N₂O)

☒ Carbon dioxide (CO₂)

☒ Perfluorocarbons (PFCs)

☒ Hydrofluorocarbons (HFCs)

☒ Sulphur hexafluoride (SF₆)

☒ Nitrogen trifluoride (NF₃)

(7.53.1.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☒ Market-based

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

1604093

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

714504

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

2318597.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2032

(7.53.1.55) Targeted reduction from base year (%)

50.4

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

1150024.112

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

1351098

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

742715

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

2093813.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☒ Yes, it covers land-related and non-land related emissions (e.g. SBT approved before the release of FLAG target-setting guidance)

(7.53.1.79) % of target achieved relative to base year

19.24

(7.53.1.80) Target status in reporting year

Select from:

☒ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Graphic Packaging's Scope 1 and 2 target covers all operations within the company's operational control. There are no exclusions from this target boundary.

(7.53.1.83) Target objective

The target objective is to reduce Graphic Packaging's global Scope 1 and 2 emissions by 50.4% from a 2021 baseline by 2032.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Our plan to reduce Scope 1 and 2 operations emissions and reach our near-term SBT starts with addressing our largest emissions sources first. Fossil fuel use in our paperboard manufacturing facilities accounts for approximately 60% of our operations emissions, and our wood-based paperboard manufacturing facilities account for 75% of total paperboard division fossil fuel use. Purchased electricity represents our next largest emissions source, accounting for approximately 35% of our Scope 1 and 2 operations footprints. We have identified three primary Scope 1 and 2 decarbonization actions that will deliver the emissions reductions needed to achieve the SBT: (1) Increase renewable fuel use from approximately 75% to 90% or more in the wood-based paperboard manufacturing facilities by upgrading boilers in West Monroe, LA and Texarkana, TX to more efficient, biomass boilers, (2) Convert 50% or more of purchased electricity to renewable/zero carbon electricity, and (3) Increase energy efficiency across all manufacturing operations. In 2024, Scope 1 and 2 operations emissions decreased 10% compared to our 2021 base year, due to the sale of our Augusta, GA facility. Excluding Augusta, adjusted 2024 Scope 1 and 2 emissions are slightly higher (4%) than the 2021 baseline emissions. The increase in adjusted emissions above base year and limited progress increasing renewable fuel and electricity use is expected, as our larger-scale reduction initiatives, such as the two biomass boiler projects, will not be implemented until after our recycled paperboard manufacturing optimization work is completed. We expect Scope 1 and 2 emissions and renewable fuel use in our wood-based paperboard manufacturing facilities to remain somewhat constant over the next few years, while we complete our recycled paperboard manufacturing optimization program, identify attractive renewable electricity opportunities, and complete the engineering design and planning for the renewable biofuel capital projects. Construction and commissioning of the new boilers will be scheduled after our Waco, TX recycled paperboard manufacturing facility is operating at full capacity, with emissions reduction impacts from the boiler projects not fully realized until the 2030-2032 timeframe.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ No

Row 2

(7.53.1.1) Target reference number

Select from:

☒ Abs 2

(7.53.1.2) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

GPI - Near-Term Approval Letter 2023.pdf

(7.53.1.4) Target ambition

Select from:

☒ Well-below 2°C aligned

(7.53.1.5) Date target was set

10/05/2023

(7.53.1.6) Target coverage

Select from:

☒ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Methane (CH ₄) | <input checked="" type="checkbox"/> Sulphur hexafluoride (SF ₆) |
| <input checked="" type="checkbox"/> Nitrous oxide (N ₂ O) | <input checked="" type="checkbox"/> Nitrogen trifluoride (NF ₃) |
| <input checked="" type="checkbox"/> Carbon dioxide (CO ₂) | |
| <input checked="" type="checkbox"/> Perfluorocarbons (PFCs) | |
| <input checked="" type="checkbox"/> Hydrofluorocarbons (HFCs) | |

(7.53.1.8) Scopes

Select all that apply

- ☒ Scope 3

(7.53.1.10) Scope 3 categories

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Scope 3, Category 1 – Purchased goods and services
Scope 1 or 2) | <input checked="" type="checkbox"/> Scope 3, Category 3 – Fuel- and energy- related activities (not included in
Scope 1 or 2) |
| <input checked="" type="checkbox"/> Scope 3, Category 10 – Processing of sold products | |
| <input checked="" type="checkbox"/> Scope 3, Category 5 – Waste generated in operations | |
| <input checked="" type="checkbox"/> Scope 3, Category 12 – End-of-life treatment of sold products | |
| <input checked="" type="checkbox"/> Scope 3, Category 4 – Upstream transportation and distribution | |

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.14) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target (metric tons CO₂e)

3347793

(7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)

506292

(7.53.1.17) Base year Scope 3, Category 4: Upstream transportation and distribution emissions covered by target (metric tons CO2e)

552442

(7.53.1.18) Base year Scope 3, Category 5: Waste generated in operations emissions covered by target (metric tons CO2e)

179739

(7.53.1.23) Base year Scope 3, Category 10: Processing of sold products emissions covered by target (metric tons CO2e)

145115

(7.53.1.25) Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target (metric tons CO2e)

1560554

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

6291935.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

6291935.000

(7.53.1.35) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target as % of total base year emissions in Scope 3, Category 1: Purchased goods and services (metric tons CO2e)

100

(7.53.1.37) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target as % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

100

(7.53.1.38) Base year Scope 3, Category 4: Upstream transportation and distribution covered by target as % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e)

100

(7.53.1.39) Base year Scope 3, Category 5: Waste generated in operations emissions covered by target as % of total base year emissions in Scope 3, Category 5: Waste generated in operations (metric tons CO2e)

100

(7.53.1.44) Base year Scope 3, Category 10: Processing of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 10: Processing of sold products (metric tons CO2e)

100

(7.53.1.46) Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 12: End-of-life treatment of sold products (metric tons CO2e)

100

(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)

94

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

(7.53.1.54) End date of target

12/31/2032

(7.53.1.55) Targeted reduction from base year (%)

30

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

4404354.500

(7.53.1.59) Scope 3, Category 1: Purchased goods and services emissions in reporting year covered by target (metric tons CO2e)

3360673

(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)

382844

(7.53.1.62) Scope 3, Category 4: Upstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

982276

(7.53.1.63) Scope 3, Category 5: Waste generated in operations emissions in reporting year covered by target (metric tons CO2e)

156434

(7.53.1.68) Scope 3, Category 10: Processing of sold products emissions in reporting year covered by target (metric tons CO2e)

77607

(7.53.1.70) Scope 3, Category 12: End-of-life treatment of sold products emissions in reporting year covered by target (metric tons CO2e)

1535088

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

6494922.000

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

6494922.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☒ Yes, it covers land-related and non-land related emissions (e.g. SBT approved before the release of FLAG target-setting guidance)

(7.53.1.79) % of target achieved relative to base year

-10.75

(7.53.1.80) Target status in reporting year

Select from:

☒ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Graphic Packaging's Scope 3 target covers all operations within the company's operational control in categories 1, 3, 4, 5, 10, and 12, representing 94% of the Company's total Scope 3 emissions in 2021.

(7.53.1.83) Target objective

The target objective is to reduce Graphic Packaging's emissions from categories 1, 3, 4, 5, 10, and 12 by 30% from a 2021 baseline by 2032.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Similarly, our plan to reduce target Scope 3 emissions 30% by 2032 focuses on the largest contributions to our value chain emissions footprint. We have identified high-level decarbonization actions that will deliver approximately 75% of emissions reductions needed to achieve our Scope 3 SBT: (1) Supplier collaboration to reduce Category 1 purchased goods emissions, (2) Supplier collaboration to identify lower carbon transport options and optimize shipments to reduce Category 4 transportation emissions (3) Industry and value chain collaboration to increase recovery rates to recycle more of our paperboard consumer packaging to reduce Category 12 end-of-life emissions, and (4) Increase renewable energy use to reduce Category 3 upstream energy emissions. These four categories (1,3,4 & 12) represent 91% of our total Scope 3 emissions and 96% of in-scope emissions addressed by our near-term SBT. Our operations teams are exploring options to close the remaining gap to reach the SBT, such as options to divert waste from offsite landfill disposal to beneficial reuse and opportunities to improve raw material asset utilization and use efficiency. 2024 Scope 3 SBT emissions have increased slightly (3%) compared to our 2021 baseline, despite the sale of the Augusta, GA facility. Excluding Augusta, adjusted 2024 Scope 3 SBT emissions were 14% higher than the 2021 baseline emissions. The observed growth in target emissions versus the 2021 baseline (both with and without Augusta) is due to improvements made to the inventory measurement methodology and the shift to using more accurate, activity-based data to estimate our Scope 3 carbon emissions footprint. We plan to review and restate our 2021 baseline in 2025, to adjust for structural changes to the Company and our updated Scope 3 measurement methodology, to enable better progress tracking towards achieving our 2032 reduction targets. In 2024, we named a Vice President, Global Supply Chain Sustainability (VPGSCS). This leader is responsible for efforts to reduce value chain emissions and increase our purchases of renewable electricity. Similar to our expectations on timing for Scope 1 emissions impacts, we anticipate it may be several years until new projects are implemented and deliver meaningful Scope 3 emissions reductions results.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ No

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☒ Other climate-related targets

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

Row 1

(7.54.2.1) Target reference number

Select from:

☒ Oth 1

(7.54.2.2) Date target was set

01/01/2024

(7.54.2.3) Target coverage

Select from:

☒ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from:

☒ Absolute

(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)

Other

☒ Other metric, please specify :Renewable / zero carbon electricity as a percent of total purchased electricity

(7.54.2.7) End date of base year

12/31/2021

(7.54.2.8) Figure or percentage in base year

(7.54.2.9) End date of target

12/31/2032

(7.54.2.10) Figure or percentage at end of date of target

50

(7.54.2.11) Figure or percentage in reporting year

3

(7.54.2.12) % of target achieved relative to base year

2.0833333333

(7.54.2.13) Target status in reporting year*Select from:*☒ Underway**(7.54.2.15) Is this target part of an emissions target?**

Yes, Abs 1

(7.54.2.16) Is this target part of an overarching initiative?*Select all that apply*☒ No, it's not part of an overarching initiative**(7.54.2.18) Please explain target coverage and identify any exclusions***The target is to convert 50% or more of global purchased electricity to renewable/zero carbon electricity by 2032.*

(7.54.2.19) Target objective

To help reach our 2032 Scope 1 and 2 operations emissions reduction SBT, Graphic Packaging's is working to convert 50% of our purchased electricity to renewable / carbon-free electricity across all global operations.

(7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year

In 2024, Graphic Packaging established an internal steering team to develop our renewable electricity purchasing strategy. We executed our first virtual power purchase agreement (VPPA) in Europe in mid 2024, which is expected to come online in late 2025. This agreement supports planned solar projects in Spain, which will enable our packaging operations in Europe to claim renewable electricity consumption equal to approximately 70% of the EMEA region's purchased electricity demand.

Row 2

(7.54.2.1) Target reference number

Select from:

☒ Oth 2

(7.54.2.2) Date target was set

01/01/2024

(7.54.2.3) Target coverage

Select from:

☒ Business division

(7.54.2.4) Target type: absolute or intensity

Select from:

☒ Absolute

(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)

Renewable fuel consumption

☒ Percentage of total fuel consumption that is from renewable sources

(7.54.2.7) End date of base year

12/31/2021

(7.54.2.8) Figure or percentage in base year

75

(7.54.2.9) End date of target

12/31/2032

(7.54.2.10) Figure or percentage at end of date of target

90

(7.54.2.11) Figure or percentage in reporting year

74

(7.54.2.12) % of target achieved relative to base year

-6.666666667

(7.54.2.13) Target status in reporting year

Select from:

☒ Underway

(7.54.2.15) Is this target part of an emissions target?

Yes, Abs 1

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

☒ No, it's not part of an overarching initiative

(7.54.2.18) Please explain target coverage and identify any exclusions

The target is to increase renewable fuel use to 90% or more in the wood-based paperboard manufacturing facilities by 2032 compared with 2021 by upgrading boilers in West Monroe, LA and Texarkana, TX to more efficient, biomass boilers.

(7.54.2.19) Target objective

To help reach our 2032 Scope 1 and 2 operations emissions reduction SBT, Graphic Packaging's operations teams are working to achieve 90% renewable fuel use in our woodbased paperboard manufacturing facilities and to improve energy efficiency across all manufacturing operations.

(7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year

Company-wide renewable fuel use decreased in 2024 versus 2023 due to both the sale of our Augusta, GA facility, and biomass boiler and turbine downtime at one of our wood-based paperboard manufacturing facilities. In 2024, our engineering team continued working on the design and planning for our biomass boiler projects, while we complete our recycled paperboard manufacturing optimization program. Once this optimization program is complete, we expect to see an approximate 20% reduction in energy and GHG intensity versus 2021 operations for recycled paperboard manufacturing. Values include emissions from the Augusta, GA facility. We will be restating our GHG inventory in 2025 to adjust for the sale of the Augusta facility and other company changes.

[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:

☒ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	2	<i>`Numeric input</i>
To be implemented	1	47200
Implementation commenced	3	427
Implemented	18	53773
Not to be implemented	0	<i>`Numeric input</i>

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☒ Process optimization

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

28000

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Our West Monroe, LA facility invested in a number of maintenance and reliability projects, such as winterization projects, that led to less down time, improving energy efficiency. Natural gas usage decreased approximately 8% from 2023 to 2024, resulting in a 28,000 metric tons CO2e reduction.

Row 2

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☒ Process optimization

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

5000

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

☒ Scope 3 category 1: Purchased goods & services

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Completed a project to use high-frequency sampling of our white and green liquor inputs to increase measurement reliability and quality for process control. These improved measurements reduced sodium hydroxide use by approximately 450 metric tons and natural gas usage by approximately 20,000 MWh, resulting in an estimated carbon dioxide equivalent (CO2e) reduction of 5,000 metric tons.

Row 3

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☒ Machine/equipment replacement

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

36

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Our Augsburg, Germany plant upgraded their drying system, reducing annual energy use 195 MWh and annual emissions 36 metric tons CO2e.

Row 4

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☒ Process optimization

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

195

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

☒ Scope 2 (location-based)

☒ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Our Graz, Austria plant implemented six energy saving projects, including process optimization and new equipment installation, reducing annual energy use 935MWh and annual emissions 171 metric tons CO2e.

Row 5

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☒ Electrification

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Our Vancouver, WA and Gresham, OR plants replaced several propane clamp trucks with electric models in 2024, saving approximately 18.5 metric tons CO2e annually.

Row 6

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Building Energy Management Systems (BEMS)

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

265

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 2 (location-based)

☒ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Our Hoogerheide, Netherlands plant improved electricity efficiency by installing power factor correction and LED lighting, reducing annual energy use 700MWh and annual emissions 265 metric tons CO2e.

Row 7

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

☒ Low-carbon electricity mix

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

125

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 2 (location-based)

☒ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Our Jundiai, Brazil packaging plant signed a five-year contract to procure renewable electricity equivalent to 100% of their purchased power, reducing emissions by approximately 125 metric tons CO2e per year.

Row 8

(7.55.2.1) Initiative category & Initiative type

Non-energy industrial process emissions reductions

☒ Process material efficiency

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

7370

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 3 category 1: Purchased goods & services

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Our operations team at the Texarkana, TX paperboard manufacturing facility completed a bleaching optimization project to reduce the amount of chlorine dioxide needed in our bleaching process by 1.9 kilograms per metric ton of pulp produced, This reduced the chemical inputs needed to produce chlorine dioxide by over 2,700 metric tons in 2024, which equates to 7,370 metric tons of CO2e emissions savings from purchased goods.

Row 9

(7.55.2.1) Initiative category & Initiative type

Transportation

☒ Other, please specify

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

6300

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 3 category 4: Upstream transportation & distribution

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Increased use of intermodal transportation options drove a decrease in truckload shipments, reducing 2024 emissions by 6,300 metric tons CO2e.

Row 10

(7.55.2.1) Initiative category & Initiative type

Transportation

☒ Other, please specify

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

4500

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 3 category 4: Upstream transportation & distribution

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

4,500 metric tons of CO2e were avoided through carrier selection choices and working closely with carriers to achieve their SmartWay certification.

Row 11

(7.55.2.1) Initiative category & Initiative type

Transportation

☒ Other, please specify

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

1900

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 3 category 4: Upstream transportation & distribution

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Efforts to optimize payloads and reduce LTL (less than truckload) miles led to a reduction in 2024 emissions by 1,900 metric tons CO2e.

Row 12

(7.55.2.1) Initiative category & Initiative type

Transportation

☒ Other, please specify

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

44

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 3 category 4: Upstream transportation & distribution

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

Our Japan operations partnered with Hitachi to re-use empty export containers instead of returning them from our warehouse to port – resulting in annual expense savings and estimated transportation emissions reduction of 44 metric tons CO2e.

Row 17

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Lighting

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

13.11

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

- ☒ Scope 2 (location-based)
- ☒ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

- ☒ Voluntary

(7.55.2.9) Comment

Replacing conventional lighting with LEDs at several sites: Istra (Kanfana), Magdeburg, Munich (Meisbach), Leeds, and Solon

Row 18

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

- ☒ Lighting

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

5.93

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

- ☒ Scope 2 (location-based)
- ☒ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

- ☒ Voluntary

(7.55.2.9) Comment

Solar lights at Ibadan site - Use of renewable energy source reduces Greenhouse gas emission from facility.
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

- ☒ Internal finance mechanisms

(7.55.3.2) Comment

In addition to return on investment calculations, potential savings and revenue opportunities are assessed as part of our overall financial analysis.

Row 2

(7.55.3.1) Method

Select from:

- ☒ Partnering with governments on technology development

(7.55.3.2) Comment

Graphic Packaging has partnered with the Department of Energy through the Better Plants program to develop projects.

Row 3

(7.55.3.1) Method

Select from:

☒ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

Graphic Packaging is in a heavily regulated industry and thus a portion of capital investments are directed to meet regulatory compliance. We continually assess capital investments for opportunities to achieve higher reductions in greenhouse gas emissions.

Row 4

(7.55.3.1) Method

Select from:

☒ Financial optimization calculations

(7.55.3.2) Comment

As a public company, Graphic Packaging applies financial rigor to capital investments to understand the return on investment. These calculations include factors such as emission reduction savings, productivity implications, and overall strategic impacts.

[Add row]

(7.68) Do you encourage your suppliers to undertake any agricultural or forest management practices with climate change mitigation and/or adaptation benefits?

Select from:

☒ Yes

(7.68.1) Specify which agricultural or forest management practices with climate change mitigation and/or adaptation benefits you encourage your suppliers to undertake and describe your role in the implementation of each practice.

Row 1

(7.68.1.1) Management practice reference number

Select from:

☒ MP1

(7.68.1.2) Management practice

Select from:

☒ Knowledge sharing

(7.68.1.3) Description of management practice

Graphic Packaging engages with landowners, loggers, and land managers on an annual basis at training events hosted by Graphic Packaging at the West Monroe, Macon, and Texarkana Paperboard Manufacturing Facilities. These training events are facilitated by professors and wood procurement managers, who instruct continuing professional educational classes on sustainable forestry management practices. In 2024 we facilitated in-person training sessions in Macon, GA, Texarkana, TX, and Minden, LA (133 loggers were trained) and also sponsored logger training through the SFI State Implementation Committees. Additionally, Graphic Packaging engages regional members of forestry certification bodies. Graphic Packaging has chosen knowledge sharing as the management practice as it directly empowers our suppliers to make informed and educated decisions with the resources shared by our industry. We expect the sharing of knowledge to create more sustainable wood baskets that increase the resiliency of our supply chain by keeping forests as forests and continuing to sequester carbon.

(7.68.1.4) Your role in the implementation

Select all that apply

☒ Knowledge sharing

(7.68.1.5) Explanation of how you encourage implementation

Suppliers are encouraged to implement these new practices through personal instruction at Graphic Packaging-sponsored informational training sessions.

(7.68.1.6) Climate change related benefit

Select all that apply

☒ Increasing resilience to climate change (adaptation)

☒ Increase carbon sink (mitigation)

(7.68.1.7) Comment

N/A

[Add row]

(7.68.2) Do you collect information from your suppliers about the outcomes of any implemented agricultural/forest management practices you have encouraged?

Select from:

☒ No

(7.70) Do you know if any of the management practices mentioned in 7.68.1 that were implemented by your suppliers have other impacts besides climate change mitigation/adaptation?

Select from:

☒ Yes

(7.70.1) Provide details of those management practices implemented by your suppliers that have other impacts besides climate change mitigation/adaptation.

Row 1

(7.70.1.1) Management practice reference number

Select from:

☒ MP1

(7.70.1.2) Overall effect

Select from:

☒ Positive

(7.70.1.3) Which of the following has been impacted?

Select all that apply

☒ Biodiversity

☒ Soil

☒ Water

(7.70.1.4) Description of impacts

We provide ongoing, multimode education to landowners, loggers, and land managers supplying our primary forest sourcing facilities. This includes targeted in-person events and the deployment of written materials aimed at supporting practices that drive climate mitigation/adaptation and biodiversity impacts. Events tailored to each audience are facilitated by experts who provide practical and targeted training. Such training is required for all loggers supplying Graphic Packaging. Our training focuses on the use of best management practices for water, soil and biodiversity protection, including: • Use stream side management zones as a buffer to protect water quality and provide wildlife corridors. • Construction of bridges to cross waterways to prevent stream disturbance. • Gaps and spacing in forest harvesting as wildlife corridors. • Distribution of tree debris to protect against soil erosion, protect water quality, and provide habitat for small ground mammals and birds. In collaboration with other companies, Graphic Packaging delivered additional, specialized learning sessions for landowners, land managers and loggers. Some examples include: - Wildlife and Fire – Fire as a Manager's Tool - First Steps for Managing Wildlife in Forested Lands - Buzz on Pollinator Habitat - Benefits to Birds, Bees, & Butterflies Additionally, in 2022, the company conducted analysis of all globally ranked critically imperiled (G1) or imperiled (G2) species for its primary sourcing supply basins. A summary including ecosystem specific management recommendations to protect the habitats of these species was provided to all primary fiber suppliers. This process will be reviewed and updated annually to expand biodiversity habitat conservation. These activities, working together, enable our suppliers to implement practices with positive benefits for biodiversity, water and soil, in the context of a changing climate.

(7.70.1.5) Have any response to these impacts been implemented?

Select from:

☒ Yes

(7.70.1.6) Description of the response(s)

We provide ongoing, multimode education to landowners, loggers, and land managers supplying our primary forest sourcing facilities. This includes targeted in-person events and the deployment of written materials aimed at supporting practices that drive climate mitigation/adaptation and biodiversity impacts. Events tailored to each audience are facilitated by experts who provide practical and targeted training. Such training is required for all loggers supplying Graphic Packaging. Our training focuses on the use of best management practices for water, soil and biodiversity protection, including: • Use stream side management zones as a buffer to protect water quality and provide wildlife corridors. • Construction of bridges to cross waterways to prevent stream disturbance. • Gaps and spacing in forest

harvesting as wildlife corridors. • Distribution of tree debris to protect against soil erosion, protect water quality, and provide habitat for small ground mammals and birds. In collaboration with other companies, Graphic Packaging delivered additional, specialized learning sessions for landowners, land managers and loggers. Additionally, in 2024, the company conducted analysis of all globally ranked critically imperiled (G1) or imperiled (G2) species for its primary sourcing supply basins. A summary including ecosystem specific management recommendations to protect the habitats of these species was provided to all primary fiber suppliers. This process will be reviewed and updated annually to expand biodiversity habitat conservation. These activities, working together, enable our suppliers to implement practices with positive benefits for biodiversity, water and soil, in the context of a changing climate.

[Add row]

(7.73) Are you providing product level data for your organization's goods or services?

Select from:

☒ No, I am not providing data

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☒ No

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☒ No

C8. Environmental performance - Forests

(8.1) Are there any exclusions from your disclosure of forests-related data?

	Exclusion from disclosure
Timber products	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

(8.2) Provide a breakdown of your disclosure volume per commodity.

	Disclosure volume (metric tons)	Volume type	Sourced volume (metric tons)
Timber products	10640019	Select all that apply <input checked="" type="checkbox"/> Sourced	10640019

[Fixed row]

(8.5) Provide details on the origins of your sourced volumes.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ United States of America

(8.5.2) First level administrative division

Select from:

☒ States/equivalent jurisdictions

(8.5.3) Specify the states or equivalent jurisdictions

GA, SC, TX, AR, LA

(8.5.4) Volume sourced from country/area of origin (metric tons)

9611776

(8.5.5) Source

Select all that apply

☒ Multiple contracted producers

☒ Contracted suppliers (processors)

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

For all paperboard manufacturing material furnish and fuelwood, including recovered fiber, we have clear insight into source origins. For wood sourced for paperboard production, we purchase volumes at the forest management unit (FMU) or tract level. For fuelwood, we have conducted plausibility analysis, considering market conditions to assess likely districts of origin, for which we can assess risks. 1,222,865 of this volume is recovered fiber.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Austria

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

60067

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 60,067 metric tons of corrugated packaging and paperboard from facilities in Austria. Of this, 45,228 metric tons are made with recycled content. For the remaining material, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, we trace back to the manufacturing facility and we have confidence that districts of origin are likely within Europe. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Brazil

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

35124

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (processors)

(8.5.7) Please explain

Graphic Packaging sourced 35,124 metric tons paperboard from facilities in Brazil. Forest source data has not been compiled by Graphic Packaging at this time but the source wood likely originates in planted pine and eucalyptus forests in the Brazilian states of Paraná, Santa Catarina and São Paulo. This full supply is traced back to the manufacturing facility. Paperboard purchases are screened to avoid controversial sources.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Canada

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

6631

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

From Canada, Graphic Packaging sourced 5,448 metric tons recycled paperboard or corrugated packaging. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, we trace back to the manufacturing facility and we have confidence that districts of origin are likely within Canada. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Chile

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

13602

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (processors)

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 13,602 metric tons paperboard from facilities in Chile. Of this, 4,311 was recycled content. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, we trace back to the manufacturing facility. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ China

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

2444

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 2,444 metric tons of paperboard from facilities in China. Forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Finland

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

128519

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging operations sourced 128,519 metric tons of paperboard and corrugated packaging from facilities in Finland. Of this, 29 metric tons were recycled content. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, districts of origin are likely within Finland and Sweden. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ France

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

7601

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 7,601 metric tons paperboard and corrugated packaging from facilities in France. Of this, 6,307 metric tons are made of recycled content. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, districts of origin are likely within Europe. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Germany

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

87055

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 87,055 metric tons of paperboard or corrugated packaging from facilities in Germany. Of this, 77,085 metric tons are made of recycled content. Forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, districts of origin are likely within Europe. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ India

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

200

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 200 metric tons of paperboard from facilities in India. Of these, 133 metric tons were made of recycled content. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Indonesia

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

21040

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 21,040 metric tons of corrugated packaging or paperboard from facilities in Indonesia. Of this, 12,066 metric tons were made of recycled fiber. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Italy

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

869

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 869 metric tons of paperboard from facilities in Italy. Of this, 767 metric tons were made of recycled fiber. For the remainder, forest source data may be available but Graphic Packaging systems are not yet configured to capture this information. However, Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Mexico

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

78138

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 78,138 metric tons paperboard from facilities in Mexico. All was made of recycled fiber. This is traceable to the supplier's facility level.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Netherlands

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

20524

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 20,524 metric tons of corrugated packaging or paperboard from facilities in the Netherlands. Of this, 4,076 metric tons were made of recycled fiber. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Poland

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

19183

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 19,183 metric tons of corrugated packaging and paperboard from facilities in Poland. Of this, 1,478 metric tons was made of recycled fiber. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain sources.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Serbia

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

6628

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 6,628 metric tons paperboard from facilities in Serbia. Of this, 6,363 metric tons were made of recycled fiber. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Slovenia

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

2149

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 2,149 metric tons paperboard from facilities in Slovenia. Of this, 1,211 metric tons were made of recycled fiber. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Spain

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

21913

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 21,913 metric tons of corrugated packaging and paperboard from facilities in Spain. Of this, 17,870 metric tons were made of recycled fiber. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Sweden

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

(8.5.5) Source*Select all that apply*☒ Contracted suppliers (manufacturers)**(8.5.7) Please explain**

Graphic Packaging sourced 118,904 metric tons of corrugated packaging and paperboard from facilities in Sweden. Of this, 28,881 metric tons were made of recycled fiber. For the remainder, forest source data may be available but Graphic packaging systems are not yet configured to capture this information. However, forest origins are likely in Sweden, Finland or neighboring Baltic country. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products**(8.5.1) Country/area of origin***Select from:*☒ Turkey**(8.5.2) First level administrative division***Select from:*☒ Not disclosing**(8.5.4) Volume sourced from country/area of origin (metric tons)**

7

(8.5.5) Source*Select all that apply*☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 7 metric tons recycled paperboard from facilities in Turkey. Of this, all was made of recycled fiber. This is traceable to the supplier's facility level.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ United Kingdom of Great Britain and Northern Ireland

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

15726

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 15,726 metric tons of corrugated packaging and paperboard from facilities in the UK. Of this, 3,833 metric tons was made of recycled fiber. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ United States of America

(8.5.2) First level administrative division

Select from:

☒ Unknown

(8.5.4) Volume sourced from country/area of origin (metric tons)

189197

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 189,197 metric tons paperboard and corrugate packaging from facilities in the US. Of this, 50,972 metric tons are made of recycled content. For the remaining content, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Unknown origin

(8.5.4) Volume sourced from country/area of origin (metric tons)

109125

(8.5.5) Source

Select all that apply

- ☒ Trader/broker/commodity market
- ☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Globally, Graphic Packaging purchased 109,125 metric tons of corrugated or other packaging materials via brokers or contract manufacturers. Of this, Graphic Packaging confirmed that 48.5 metric tons of corrugated packaging was made of recycled content and 108,178 metric tons of the other packaging material were confirmed as sustainably sourced. These purchases are informed by our purchase policies designed to eliminate sourcing from controversial sources and are a focal area for Graphic Packaging.

Timber products

(8.5.1) Country/area of origin

Select from:

- ☒ Australia

(8.5.2) First level administrative division

Select from:

- ☒ Unknown

(8.5.4) Volume sourced from country/area of origin (metric tons)

1285

(8.5.5) Source

Select all that apply

- ☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 1,285 metric tons paperboard from facilities in Australia. All was made of recycled fiber. This is traceable to the supplier's facility level. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Czechia

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

603

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (processors)

(8.5.7) Please explain

Graphic Packaging sourced 603 metric tons paperboard from facilities in Czech Republic. Forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Estonia

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

54

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 54 metric tons corrugated packaging from facilities in Estonia. Of this, 47 metric tons were recycled content. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Latvia

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

(8.5.5) Source*Select all that apply*☒ Contracted suppliers (manufacturers)**(8.5.7) Please explain**

Graphic Packaging sourced 132 metric tons corrugated packaging from facilities in Latvia. Of this, 106 metric tons were recycled content. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products**(8.5.1) Country/area of origin***Select from:*☒ Lithuania**(8.5.2) First level administrative division***Select from:*☒ Not disclosing**(8.5.4) Volume sourced from country/area of origin (metric tons)**

13

(8.5.5) Source*Select all that apply*☒ Contracted suppliers (manufacturers)**(8.5.7) Please explain**

Graphic Packaging sourced 13 metric tons corrugated packaging from facilities in Lithuania. Of this, 12 metric tons were recycled content. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Nigeria

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

88

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 88 metric tons paperboard from facilities in Nigeria. All was made of recycled fiber. This is traceable to the supplier's facility level. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ New Zealand

(8.5.2) First level administrative division

Select from:

☒ Unknown

(8.5.4) Volume sourced from country/area of origin (metric tons)

5520

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 5,520 metric tons paperboard from facilities in New Zealand. Forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, this material likely originated in New Zealand. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Portugal

(8.5.2) First level administrative division

Select from:

☒ Unknown

(8.5.4) Volume sourced from country/area of origin (metric tons)

(8.5.5) Source*Select all that apply*☒ Contracted suppliers (manufacturers)**(8.5.7) Please explain**

Graphic Packaging sourced 161 metric tons paperboard from facilities in Portugal. Forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products**(8.5.1) Country/area of origin***Select from:*☒ Republic of Korea**(8.5.2) First level administrative division***Select from:*☒ Not disclosing**(8.5.4) Volume sourced from country/area of origin (metric tons)**

2642

(8.5.5) Source*Select all that apply*☒ Contracted suppliers (manufacturers)**(8.5.7) Please explain**

Graphic Packaging sourced 2,642 metric tons paperboard from facilities in South Korea. All was made of recycled fiber. This is traceable to the supplier's facility level. Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Switzerland

(8.5.2) First level administrative division

Select from:

☒ Not disclosing

(8.5.4) Volume sourced from country/area of origin (metric tons)

146

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Graphic Packaging sourced 146 metric tons corrugated packaging from facilities in Switzerland. Of this, 132 metric tons were recycled content. For the remainder, forest source data may be available, but Graphic Packaging systems are not yet configured to capture this information. However, Graphic Packaging is committed to avoiding controversial sources and to building transparency in our supply chain.

[Add row]

(8.7) Did your organization have a no-deforestation or no-conversion target, or any other targets for sustainable production/ sourcing of your disclosed commodities, active in the reporting year?

Timber products

(8.7.1) Active no-deforestation or no-conversion target

Select from:

☒ Yes, we have a no-deforestation target

(8.7.2) No-deforestation or no-conversion target coverage

Select from:

☒ Organization-wide (including suppliers)

(8.7.5) Other active targets related to this commodity, including any which contribute to your no-deforestation or no-conversion target

Select from:

☒ Yes, we have other targets related to this commodity

[Fixed row]

(8.7.1) Provide details on your no-deforestation or no-conversion target that was active during the reporting year.

Timber products

(8.7.1.1) No-deforestation or no-conversion target

Select from:

☒ No-deforestation

(8.7.1.2) Your organization's definition of "no-deforestation" or "no-conversion"

Deforestation is defined as unmitigated, human-caused conversion. Conversion is defined as the conversion of natural forests to non-forest land use.

(8.7.1.3) Cutoff date

Select from:

☒ 2020

(8.7.1.4) Geographic scope of cutoff date

Select from:

☒ Applied globally

(8.7.1.5) Rationale for selecting cutoff date

Select from:

☒ Compliance with initiative, please specify :EUDR, SFI

(8.7.1.6) Target date for achieving no-deforestation or no-conversion

Select from:

☒ 2026-2030

Timber products

(8.7.1.1) No-deforestation or no-conversion target

Select from:

☒ No-conversion

(8.7.1.2) Your organization's definition of "no-deforestation" or "no-conversion"

Deforestation is defined as unmitigated, human-caused conversion. Conversion is defined as the conversion of natural forests to non-forest land use.

(8.7.1.3) Cutoff date

Select from:

☒ 2020

(8.7.1.4) Geographic scope of cutoff date

Select from:

☒ Applied globally

(8.7.1.5) Rationale for selecting cutoff date

Select from:

☒ Compliance with initiative, please specify :EUDR, SFI, FSC

(8.7.1.6) Target date for achieving no-deforestation or no-conversion

Select from:

☒ 2026-2030

[Add row]

(8.7.2) Provide details of other targets related to your commodities, including any which contribute to your no-deforestation or no-conversion target, and progress made against them.

Timber products

(8.7.2.1) Target reference number

Select from:

☒ Target 1

(8.7.2.2) Target contributes to no-deforestation or no-conversion target reported in 8.7

Select from:

☒ Yes, this target contributes to our no-deforestation target

(8.7.2.3) Target coverage

Select from:

☒ Organization-wide (including suppliers)

(8.7.2.4) Commodity volume covered by target (metric tons)

Select from:

☒ Disclosure volume

(8.7.2.5) Category of target & Quantitative metric

Third-party certification

☒ Other third-party certification target metric, please specify :100% of purchased forest products are sustainably sourced

(8.7.2.7) Third-party certification scheme

Forest management unit/Producer certification

☒ FSC Controlled Wood certification

Chain-of-custody certification

☒ FSC Recycled certification

☒ Other chain-of-custody certification, please specify :**SFI Sustainable Sourcing**

RPA 100% recycled content

☒ PEFC Recycled certification

☒ PEFC Chain-of-Custody (any type)

☒ SFI Chain-of-Custody – Percentage

☒ FSC Chain-of-Custody certification (any type)

(8.7.2.8) Date target was set

01/01/2023

(8.7.2.9) End date of base year

12/31/2023

(8.7.2.10) Base year figure

(8.7.2.11) End date of target

12/31/2030

(8.7.2.12) Target year figure

100

(8.7.2.13) Reporting year figure

89

(8.7.2.14) Target status in reporting year

Select from:

☒ New**(8.7.2.15) % of target achieved relative to base year**

0.00

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Sustainable Development Goals**(8.7.2.17) Explain target coverage and identify any exclusions**

As part of our 2030 Sustaining Forests goal, Graphic Packaging is working to implement consistent, sustainable purchasing practices for all forest derived products. This commitment extends beyond purchased wood to make paperboard and includes other forest derived materials such as fuel wood and purchased paper, paperboard, and packaging materials to ship our products. In 2023, we worked to establish our baseline across all purchased forest products and began expanding our sustainable sourcing processes to encompass these buy categories. At year-end 2024, 100% of our paperboard manufacturing facility fiber inputs were certified as sustainably sourced. We have achieved the goal and have a robust process in place for sourcing these materials. We are building on the successes from this part of our operations and are applying our learning to externally produced board, for which 65% of 2024 purchases were verified sustainably sourced, and packaging

materials, of which 43% of 2024 purchases were verified as sustainable, along with fuelwood purchases, which are currently unverified. Based on anecdotal evidence and knowledge, we believe the percentage of materials qualifying as sustainably sourced may actually be higher in each of these categories. As such, we are building the infrastructure needed to more precisely evaluate and verify sustainability credentials of purchased materials in each category, as well as pathways to meet our goals for each.

(8.7.2.18) Plan for achieving target, and progress made to the end of the reporting year

For raw material supply to our paperboard manufacturing facilities, we follow and are rigorously audited to expansive certification standards to assure responsible sourcing for 100% of our feedstock. This approach is based on the following 3 principles: 1. Procurement of local sustainably produced wood fiber and 2. Credible third-party forest certification for our materials and sourcing practices 3. Maximizing use of recovered fiber and recovery of wood waste. First, our wood procurement team works directly with our suppliers to help define their forest management objectives. Graphic Packaging's wood procurement procedures identify sustainable sourcing parameters, compliance measures, and how Graphic Packaging supports our suppliers. Each supplier, their sourcing regions, and practices are evaluated before they can deliver wood to our facilities. Their sourcing practices are subject to annual internal and third-party reviews. Second, Graphic Packaging uses FSC, PEFC, SFI and RPA100 certifications as a baseline sustainability system to guide our operations. Certification contributes to consumer confidence that our products support environmentally socially and economically sound practices from sustainably managed forests to credible supply chain tracing manufacturing and delivery. Third, we leverage waste or residual materials from other parts of the forest product sector, including the lumber industry, as a sustainably sourced input, along with recovered fiber. The target covers the furnish mix for our paperboard manufacturing facilities, which represents 83% of the forest products we source for our operations. The remaining 17% of forest products are sourced fuel wood, external paperboard, and secondary packaging materials. In February 2024, we announced our new 2030 goals which includes sustainably sourcing 100% of the forest products used in our operations. Graphic Packaging is implementing consistent, sustainable purchasing practices for all forest-derived products, such as external purchased board and secondary packaging materials. In doing so, we are increasing visibility into our global supply chains, on our journey towards a deforestation-free supply chain.

(8.7.2.20) Further details of target

In 2024, our wood procurement team continued taking steps to enhance wood source tracking capability for all relevant materials, to comply with the intent of the EU Regulation on Deforestation-free Products (EUDR), and avoid deforestation in our supply chain. We worked with suppliers, third-party solution providers, independent truckers, and others to develop and implement a tool that records the GPS coordinates of harvested trees. This platform augments our internal source tracking capability and produces data to be compliant with the intent of the EUDR legislation. The EUDR has elements that require guidance such as country risk designation and residual chip traceability. We continue to adjust our approach as clarifications are published. As part of EUDR compliance, we seek better visibility into on-the-ground conditions in forests of origin for external board procurement. When we purchase external paperboard, we leverage our supplier screening and fiber certification to ensure sustainable sourcing. In the future, our European external forest products suppliers will also provide necessary geolocation information. In addition, we are leveraging tools and analyses developed by Sedex, as well as expert sustainability consultants, to assess supply chain risks such as deforestation, workers' rights, biodiversity, water, and business ethics. Our new system of supplier tracking, traceability, and risk assessments, in compliance with emerging EUDR legislation, will help us continue to sustainably source external board and other forest products.

[Add row]

(8.8) Indicate if your organization has a traceability system to determine the origins of your sourced volumes and provide details of the methods and tools used.

Timber products

(8.8.1) Traceability system

Select from:

☒ Yes

(8.8.2) Methods/tools used in traceability system

Select all that apply

- ☒ Chain-of-custody certification
- ☒ Supplier engagement/communication
- ☒ Landscape and jurisdictional approaches

(8.8.3) Description of methods/tools used in traceability system

The Company continues to refine its traceability approach across sourcing of wood products into its operations. These products include wood fibers, recovered fiber purchased for production, fuelwood used at its primary manufacturing facilities, and paperboard made by others that is converted into packaging as well as the packaging used to contain products for shipping including roll cores and pallets. For fiber and fuelwood flowing into primary manufacturing facilities, third-party audited COC and controlled wood certification programs ensure traceability of wood fiber from sustainably managed forests through the supply chain to our customers. We trace to tracts certified to FSC or SFI in the US and for non-certified forests, the SFI Fiber Sourcing and FSC Controlled Wood standards outline necessary steps to demonstrate the wood is responsibly sourced from low-risk forest regions. For uncertified materials, we apply a multistep risk assessment and due diligence process to evaluate potential risks from sourcing wood within the geographies of origin. This includes ensuring we avoid impacts on HCVs or forests with exceptional conservation value (FECVs) and imperiled species. For external board and packaging, in 2023, we began to apply sourcing criteria derived from our wood operations, including review of sources and engaging suppliers to understand the forest origins of their supplies and evaluate the risks of controversial sourcing in those geographies. Building on that groundwork, in 2024, we achieved visibility into the country of manufacture for purchased board, an accomplishment we are proud of. Greater visibility of our global packaging procurement was also a development area in 2024. We are encouraged by our learning and growth in this area and are focusing efforts to reach our goals for these important inputs. As we pursue a 2030 goal of achieving 100% sustainable sourcing forest products, we will continue to expand our systems to gather and compile more data about forest origins of our wood fiber products. Additionally, in 2024, we partnered with technological leaders,, to build a robust, multifaceted system to support our compliance with EUDR. This is driving traceability through our paperboard manufacturing supply chains, from our facilities back to the forest. Similarly, we are engaging our suppliers of purchased wood products to trace their supply chains back to the forest for EUDR compliance and traceability.

[Fixed row]

(8.8.1) Provide details of the point to which your organization can trace its sourced volumes.

Timber products

(8.8.1.1) % of sourced volume traceable to production unit

0

(8.8.1.2) % of sourced volume traceable to sourcing area and not to production unit

94

(8.8.1.3) % sourced volume traceable to country/area of origin and not to sourcing area or production unit

0

(8.8.1.4) % of sourced volume traceable to other point (i.e., processing facility/first importer) not in the country/area of origin

5

(8.8.1.5) % of sourced volume from unknown origin

1

(8.8.1.6) % of sourced volume reported

100.00
[Fixed row]

(8.9) Provide details of your organization's assessment of the deforestation-free (DF) or deforestation- and conversion-free (DCF) status of its disclosed commodities.

Timber products

(8.9.1) DF/DCF status assessed for this commodity

Select from:

☒ Yes, deforestation- and conversion-free (DCF) status assessed

(8.9.2) % of disclosure volume determined as DF/DCF in the reporting year

89

(8.9.3) % of disclosure volume determined as DF/DCF through a third-party certification scheme providing full DF/DCF assurance

89

(8.9.4) % of disclosure volume determined as DF/DCF through monitoring of production unit

0

(8.9.5) % of disclosure volume determined as DF/DCF through monitoring of sourcing area

72

(8.9.6) Is a proportion of your disclosure volume certified through a scheme not providing full DF/DCF assurance?

Select from:

☒ No

[Fixed row]

(8.9.1) Provide details of third-party certification schemes used to determine the deforestation-free (DF) or deforestation- and conversion-free (DCF) status of the disclosure volume, since specified cutoff date.

Timber products

(8.9.1.1) Third-party certification scheme providing full DF/DCF assurance

Chain-of-custody certification

☒ Other chain-of-custody certification, please specify :FSC COC/Controlled Wood, SFI Sustainable Sourcing, SFI COC, RPA100, FSC Recycled

(8.9.1.2) % of disclosure volume determined as DF/DCF through certification scheme providing full DF/DCF assurance

89

(8.9.1.3) Comment

We have set a 2030 goal to achieve sustainable sourcing for 100% forest products sourced for our operations. We are actively evaluating potential impacts related to deforestation and conversion, as we continue to refine our systems to capture and analyze data about the certifications and forest origins of the wood products we purchase in pursuit of this goal. For all furnish to our primary sourcing facilities, 100% of wood is controlled for deforestation/conversion via FSC Controlled Wood, as well as PEFC Controlled Sources and SFI Fiber Sourcing. Analysis for deforestation trends and risks is conducted for sourcing areas for fuelwood into primary facilities. Recovered fiber is also considered deforestation/conversion free. For externally produced paperboard and packaging, we deploy a screening process that leverages credible forest certification claims (SFI, PEFC, FSC) to support our purchasing decisions and analysis of potential impacts related to deforestation or conversion. At this stage, 89% of forest product purchases are verified via valid forest sourcing certification certificates. Additionally, in 2024, partnering with technological leaders in the forestry space, including Resource Wise and Orbis, we are building a robust, multifaceted system to support our compliance with EUDR. This is driving traceability through our paperboard manufacturing supply chains, from our facilities back to the forest. Similarly, we are engaging our suppliers of other purchased wood products, including external board, to trace their supply chains back to the forest to promote EUDR compliance and traceability, generally.

(8.9.1.4) Certification documentation

2024-Graphic-Packaging-Impact-Report-1 (1).pdf

[Add row]

(8.9.4) Provide details of the sourcing area monitoring used to determine deforestation-free (DF) or deforestation- and conversion-free (DCF) status of volumes since specified cutoff date.

Timber products

(8.9.4.1) % of disclosure volume determined as DF/DCF through monitoring of deforestation and conversion within the sourcing area

(8.9.4.2) Monitoring approach used for determining that sourcing areas have no or negligible risk of deforestation or conversion

Select all that apply

- ☒ Ground-based monitoring
- ☒ Independent studies
- ☒ Pre-existing current and credible risk profiles/indexes

(8.9.4.3) Description of approach, including frequency of assessment

Graphic Packaging uses the FSC National Risk Assessment (a preexisting credible risk profiling), as well as conducts an independent analysis of the USDA Forest Service Forest Inventory and Analysis (FA) data (a ground based field inventory). This analysis is revised approximately every 3 years.

(8.9.4.4) Countries/areas of origin

Select all that apply

- ☒ United States of America

(8.9.4.5) Sourcing areas

Georgia, South Carolina, Texas, Louisiana, Arkansas

(8.9.4.6) DF/DCF status is verified

Select from:

- ☒ Yes

(8.9.4.7) Type of verification

Select all that apply

- ☒ First party
- ☒ Third party

(8.9.4.8) % of your disclosure volume that is both determined as DF/DCF through sourcing area monitoring and is verified as DF/DCF

72

(8.9.4.9) Explain the process of verifying DF/DCF status

Our process for verifying DF/DCF status includes our third-party audits to the FSC, SFI and PEFC standards, as well as our own analysis, the use of the FSC NRA, and onsite monitoring of a sample of harvest tracts annually.

(8.9.4.11) Use of risk classification

We utilize risk classifications articulated in the FSC, PEFC and SFI certification systems to inform intensity of monitoring. These include areas identified via the FSC US NRA for elevated risk, as well as those identified in our of analysis as regions experiencing forest area decline, with forest loss of over 1% in the last 10 years, using FIA data, as well as ancillary analysis provided by the National Council on Air and Stream Improvement (NCASI).
[Fixed row]

(8.10) Indicate whether you have monitored or estimated the deforestation and conversion of other natural ecosystems footprint for your disclosed commodities.

	Monitoring or estimating your deforestation and conversion footprint
Timber products	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(8.10.1) Provide details on the monitoring or estimating of your deforestation and conversion footprint.

Timber products

(8.10.1.1) Monitoring and estimating your deforestation and conversion footprint

Select from:

☒ We monitor the deforestation and conversion footprint in our value chain

(8.10.1.2) % of disclosure volume monitored or estimated

100

(8.10.1.3) Reporting of deforestation and conversion footprint

Select all that apply

☒ During the reporting period

(8.10.1.5) Known or estimated deforestation and conversion footprint in the reporting period (hectares)

0

(8.10.1.9) Describe the methods and data sources used to monitor or estimate your deforestation and conversion footprint

For all paperboard manufacturing material furnish and fuelwood, including recovered fiber (90% of disclosure volume), we used the USDA Forest Service's Forest Inventory and Analysis (FIA) data to analyze the counties included in our wood supply basin footprint to understand changes in land use and risk of deforestation. This analysis followed both a deterministic and statistical approach to the FIA data, with an applied 95% confidence interval. Results from the analysis estimated 0.5% forest loss across the broader supply basin, roughly 230,000 acres or 90,244 HA. For externally produced paperboard and packaging (10% of disclosure volume), we deploy a screening process that leverages credible forest/fiber certification claims (SFI, PEFC, FSC, RPA100) and country of origin analyses to assess potential deforestation or conversion impacts. In 2024, 89% of total forest product purchases are verified DCF. The status of the remaining 11% is undetermined, but believed to be DCF. We also partnered with forestry sector technology leaders (i.e. Resource Wise and Orbis) to build a robust, multifaceted system to support EUDR compliance and drive supply chain traceability through our paperboard manufacturing supply chains back to the forest. Similarly, we are engaging suppliers of other purchased forest products, including paperboard and packaging, to trace their supply chains back to the forest to promote EUDR compliance and traceability and demonstrate a DCF supply chain.

[Add row]

(8.11) For volumes not assessed and determined as deforestation- and conversion-free (DCF), indicate if you have taken actions in the reporting year to increase production or sourcing of DCF volumes.

	Actions taken to increase production or sourcing of DCF volumes
Timber products	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

[Fixed row]

(8.11.1) Provide details of actions taken in the reporting year to assess and increase production/sourcing of deforestation- and conversion-free (DCF) volumes.

Timber products

(8.11.1.1) Action type

Select from:

☒ Increasing traceability

(8.11.1.2) % of disclosure volume that is covered by this action

100

(8.11.1.3) Indicate whether you had any major barriers or challenges related to this action in the reporting year

Select from:

☒ Yes

(8.11.1.4) Main measures identified to manage or resolve the challenges

Select all that apply

☒ Greater supplier awareness/engagement

☒ Increased knowledge on commodity driven deforestation, forest degradation and/or conversion

- Investment in monitoring tools and traceability systems
- Improvement in data collection and quality

(8.11.1.5) Provide further details on the actions taken, their contribution to achieving DCF status, and any related barriers or challenges

In pursuit of our 2030 goal to achieve sustainable sourcing for 100% forest products sourced for our operations, we are carefully refining our systems to better understand the origins of the wood products we buy, considering how to leverage certifications and identify the barriers to meeting our aims. Through this, we continue to refine our systems to capture and analyze data about the certifications and forest origins of the wood products we purchase. For all material furnish into our primary sourcing facilities, which represents 72% of wood products purchasing, we monitor trends in deforestation and conversion and require annual declarations from suppliers about their sourcing regions and practices, including avoidance of conversions. We also analyze forest loss to monitor conversions and deforestation in our wood baskets. For purchased board and packaging, certifications provide a key tool. Additionally, in 2024, partnering with technological leaders in the forestry space, including Resource Wise and Orbis, we built a robust, multifaceted system to support our compliance with EUDR. This is driving traceability through our paperboard manufacturing supply chains, from our facilities back to the forest. Similarly, we are engaging our suppliers of other purchased wood products, including external board, to trace their supply chains back to the forest to promote EUDR compliance and traceability. Lastly, Graphic Packaging has also initiated a range of approaches to bring greater monitoring to post harvest activities on our fiber tracts of origin. Given the smallholder private land base from which we source, we expect to continue to learn from these steps which we believe will continue to drive enhanced action against deforestation in our upstream supply chain and conservation of the forests in the supply basins from which we source.

[Add row]

(8.13) Does your organization calculate the GHG emission reductions and/or removals from land use management and land use change that have occurred in your direct operations and/or upstream value chain?

	GHG emissions reductions and removals from land use management and land use change calculated
Timber products	Select from: <input checked="" type="checkbox"/> Yes, but not willing to share details with requesting CDP Supply Chain members

[Fixed row]

(8.14) Indicate if you assess your own compliance and/or the compliance of your suppliers with forest regulations and/or mandatory standards, and provide details.

(8.14.1) Assess legal compliance with forest regulations

Select from:

☒ Yes, from suppliers

(8.14.2) Aspects of legislation considered

Select all that apply

☒ Environmental protection

☒ Forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting

(8.14.3) Procedure to ensure legal compliance

Select all that apply

☒ Certification

☒ First party audits

☒ Ground-based monitoring

☒ Supplier self-declaration

☒ Third party databases

(8.14.5) Please explain

We follow sustainable sourcing practices in accordance with the SFI Certified and Fiber Sourcing and FSC Controlled Wood certification programs and applicable legislation at the local, state, federal and international levels. These approaches currently apply to our wood and external paperboard sourcing. The Company is also working to fully expand a similar approach for our procurement of fuelwood and packaging, to achieve our 2030 goal of 100% sustainable sourcing for all forest products procured. The applicable laws we evaluate in our current system include those applying to labor/workers' rights, land tenure rights, human rights and rights of Indigenous communities under the United Nations Declaration of Rights of Indigenous Peoples, along with environmental and nature protection including biodiversity, water, soils, air quality and all laws applying harvesting, regeneration and other aspects. Our operations, under these programs, are both first and third-party audited. Additionally, we conduct risk assessments that leverage third-party databases and assessments including the Environmental Performance Index (produced by Yale and Columbia Universities) which evaluates the presence and rigor of environmental laws and Transparency International's indices including Corruption Perception Index looking at rule of law, enforcement and other aspects. We annually review legal and other risks in our supply regions and adjust our risk ratings and DDS as needed. For wood sourcing to our primary manufacturing facilities, we also require legally binding agreements with all our suppliers that all fiber

provided to us is fully compliant with all applicable laws. We further monitor and engage loggers, wood brokers, and wood suppliers before, during, and after harvests to ensure compliance with all laws, as well as the use of forest stewardship BMPs. Graphic Packaging requires wood suppliers to follow BMPs during harvesting even when the BMPs are voluntary in the state. Required BMPs include using riparian buffers (examples: leaving a band of trees several meters wide around water features to keep streamside vegetation intact and shade the waters keeping water temperatures cool and providing vital cover for fish amphibians and other species). Similarly, BMPs are followed for planning harvest routes and building roads within forest tracts to minimize runoff and sediment deposit into water bodies. We work with state forestry commissions during harvest to monitor supplier implementation and use of BMPs. We evaluate legal compliance with an emphasis on measures to protect biodiversity, water, and soil, during first- and third-party onsite monitoring and audits. While the Company works in partnership with state forestry commissions to monitor postharvest activities, we have also undertaken a more robust approach with our own Company foresters inspecting tracts regularly during harvest activities. In fact, the Company has exceeded its own goals in this area performing forest origin inspections on tracts representing most of the volume supplied to our facilities every year. Inspections ensure infrastructure is in place to protect water quality, avoid sedimentation, and other impacts. Our robust monitoring system of harvest inspections helps provide us with the assurance that our suppliers are meeting our expectations and enables us to understand and correct any conditions or practices that do not. This includes all aspects required by law.

[Fixed row]

(8.15) Do you engage in landscape (including jurisdictional) initiatives to progress shared sustainable land use goals?

	Engagement in landscape/jurisdictional initiatives
	Select from: <input checked="" type="checkbox"/> Yes, we engage in landscape/jurisdictional initiatives

[Fixed row]

(8.15.1) Indicate the criteria you consider when prioritizing landscapes and jurisdictions for engagement in collaborative approaches to sustainable land use and provide an explanation.

(8.15.1.1) Criteria for prioritizing landscapes/jurisdictions for engagement

- Select all that apply
- ☒ Risk of biodiversity loss
 - ☒ Commodity sourcing footprint

- ☒ Current and future sourcing risk
- ☒ Organization has operational presence in area
- ☒ Opportunity to protect and restore natural ecosystems
- ☒ Ability to contribute to/ build on existing landscape/jurisdictional initiatives
- ☒ Risk of deforestation, forests/land degradation, or conversion of other natural ecosystems
- ☒ Recognized as priority landscape by credible multi-stakeholder groups or industry platforms

(8.15.1.2) Explain your process for prioritizing landscapes/jurisdictions for engagement

Amplifying positive impacts on forests via conservation and restoration activities complement our commitment to sustainable forest management and responsible sourcing. As a procuring company, especially of wood for our primary manufacturing facilities, our procedures start with understanding landscape connectivity and potential risks within our sourcing regions. Because wood procurement for use in our primary manufacturing of paperboard accounts for the largest share of our wood fiber consumption across the global enterprise, we prioritize our on-the-ground engagement in American jurisdictions from which we source that wood and around issues where we feel we can have the greatest influence, especially as part of a coalition or group of partners working to move the needle in a specific geography. For us, that is generally biodiversity and combating forest loss. We support the efforts of forest conservation organizations to develop actions that improve our own procurement practices. These strategic partnerships are essential for society to scale long-term impact and to develop sustainable solutions for critical regional and global forestry issues.

[Fixed row]

(8.15.2) Provide details of your engagement with landscape/jurisdictional initiatives to sustainable land use during the reporting year.

Row 1

(8.15.2.1) Landscape/jurisdiction ID

Select from:

- ☒ LJ1

(8.15.2.2) Name of initiative

Forests with Exceptional Conservation Values (FECVs)

(8.15.2.3) Country/area

Select from:

☒ United States of America

(8.15.2.4) Name of landscape or jurisdiction area

Georgia, Louisiana, Arkansas, Mississippi

(8.15.2.6) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ No, area is unknown

(8.15.2.8) Type of engagement

Select all that apply

☒ Partner: Shares responsibility with other stakeholders to manage and implement actions.

☒ Implementer: Executes actions based on the collective goals

☒ Funder: Provides full or partial financial resources

(8.15.2.9) Engagement start year

2022

(8.15.2.10) Engagement end year

Select from:

☒ Not defined

(8.15.2.12) Landscape goals supported by engagement

Environmental

☒ Biodiversity protected and/or restored

☒ Decreased ecosystem degradation rate

☒ Ecosystem services maintained and/or enhanced

- ☒ Natural ecosystems conserved and/or restored

Production

- ☒ Increased adoption of sustainable production practices (e.g., input use efficiency and water management practices)
- ☒ Sustainability of other natural resource-based production sectors promoted to and recognized by relevant stakeholders (e.g. mining, natural forest management and non-extractive uses)

(8.15.2.13) Organization actions supporting initiative

Participate in planning and multi-stakeholder alignment

- ☒ Collaborate on establishing and managing monitoring system for biodiversity, habitat fragmentation and/or threats to IUCN Red List species in priority areas

Build community and multi-stakeholder capacities

- ☒ Other actions relating to building community and multi-stakeholder capacities, please specify :Through the development and dissemination of assessments of critically imperiled and imperiled (G1 and G2) species in our supply basins, we are elevating awareness of these species, their habitats and forest practices that protect and enhance.

Link value chain action to landscape/jurisdictional initiative through private sector collaboration

- ☒ Other actions relating to linking value chain action to landscape/jurisdictional initiatives through private sector collaboration :Engagement with other SFI certified companies on species conservation

(8.15.2.14) Type of partners engaged in the initiative design and implementation

Select all that apply

- ☒ NGO and/or civil society
- ☒ Private sector

(8.15.2.15) Description of engagement

Leveraging the NatureServe Explorer Pro tool and expert consultation of biologists and other specialists. In this process, we analyze the potential impact of tree harvesting on globally ranked, critically imperiled, or imperiled species found in the sourcing area. Based on this analysis, we developed groupings of species according to habitat types and likelihood of impacts or opportunities to enhance habitat with forest management activities. Based on these groupings, we make

recommendations to guide in-woods activities and promote species and biodiversity conservation. We provide a summary of the analysis and recommendations to all our wood suppliers with a goal of driving conservation impact across our sourcing activities. Our competitors are doing the same and, together, we hope to be a driver of species and habitat restoration.

(8.15.2.16) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

☒ Yes, progress is monitored using an internally defined framework

(8.15.2.17) State the achievements of your engagement so far and how progress is monitored

Progress is monitored by our third party auditors. They evaluate the degree to which the practices to support G1/G2 species are understood by our procurement personnel and suppliers. Additional monitoring of implementation, training and awareness is anticipated in the coming year.

(8.15.2.18) Claims made

Select from:

☒ No, we are not making any claims, and we do not plan to within the next two years

Row 2

(8.15.2.1) Landscape/jurisdiction ID

Select from:

☒ LJ3

(8.15.2.2) Name of initiative

American Forest Foundation

(8.15.2.3) Country/area

Select from:

☒ United States of America

(8.15.2.4) Name of landscape or jurisdiction area

Georgia

(8.15.2.6) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ No, area is unknown

(8.15.2.8) Type of engagement

Select all that apply

☒ Funder: Provides full or partial financial resources

(8.15.2.9) Engagement start year

2024

(8.15.2.10) Engagement end year

Select from:

☒ Not defined

(8.15.2.12) Landscape goals supported by engagement

Environmental

☒ Biodiversity protected and/or restored

☒ Ecosystem services maintained and/or enhanced

Other

☒ Other, please specify :Financial and technical conservation support to smallholders

(8.15.2.13) Organization actions supporting initiative

Build community and multi-stakeholder capacities

☒ Engage stakeholders on importance of conservation, restoration and/or rehabilitation

(8.15.2.14) Type of partners engaged in the initiative design and implementation

Select all that apply

☒ National government

☒ NGO and/or civil society

☒ Producers

☒ Private sector

☒ Other, please specify :Private, smallholder producers

(8.15.2.15) Description of engagement

As the trusted and valued partner to family forest owners, as well as a broad range of organizations, including federal and state public agencies, forest industry, brands, and conservation organizations, American Forest Foundation (AFF) is uniquely positioned to work with Graphic Packaging to develop and administer tailored on-the-ground solutions. In 2024, building on a multi-year partnership focused on restoration of longleaf pine and late successional bottomland hardwoods, Graphic Packaging initiated a new partnership with AFF around their Field to Forest program. This new program supports family landowners in Georgia by planting regionally specific loblolly pine seedlings on marginally productive or difficult to manage pastures or croplands. The program matches landowners with professional foresters and contractors who help write planting plans suited to the land's condition and coordinate the planting process from start to finish – including site preparation, planting seedlings, and post planting maintenance. Credibility: AFF is the leading organization working with family forest landowners in the United States. AFF methods are grounded in nearly 80 years of experience and rigorous cutting-edge science and techniques that change landowner behaviors. Demonstrable and measurable impact: Not only is AFF a well-respected, credible partner, but AFF's approach produced real and verifiable actions that were documented and validated.

(8.15.2.16) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

☒ Yes, progress is collectively monitored using a shared external framework, please specify :American Forest Foundation monitored implementation by smallholders.

(8.15.2.17) State the achievements of your engagement so far and how progress is monitored

AFF's Field to Forest program is relatively new; landowner selection and metrics have not yet been reported.

(8.15.2.18) Claims made

Select from:

☒ No, we are not making any claims, and we do not plan to within the next two years

Row 3

(8.15.2.1) Landscape/jurisdiction ID

Select from:

☒ LJ2

(8.15.2.2) Name of initiative

Black Bayou conservation initiative

(8.15.2.3) Country/area

Select from:

☒ United States of America

(8.15.2.4) Name of landscape or jurisdiction area

Louisiana

(8.15.2.6) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ No, area is unknown

(8.15.2.8) Type of engagement

Select all that apply

☒ Funder: Provides full or partial financial resources

(8.15.2.9) Engagement start year

2015

(8.15.2.10) Engagement end year

Select from:

☒ Not defined

(8.15.2.12) Landscape goals supported by engagement

Environmental

☒ Biodiversity protected and/or restored

(8.15.2.13) Organization actions supporting initiative

Build community and multi-stakeholder capacities

☒ Engage stakeholders on importance of conservation, restoration and/or rehabilitation

(8.15.2.14) Type of partners engaged in the initiative design and implementation

Select all that apply

☒ National government

☒ Local communities

☒ NGO and/or civil society

☒ Private sector

(8.15.2.15) Description of engagement

We are a longtime partner in the Black Bayou conservation initiative. The Black Bayou region, near our West Monroe facility, provides a variety of habitats for waterfowl, endangered wildlife, neo-tropical migratory birds, and resident wildlife. Bottomland hardwood forests support a spectrum of species including prothonotary warblers, while bald cypress swamps harbor broad-banded water snakes, a multitude of frogs, and iconic species such as the American alligator, anhingas (large darter birds), and great blue herons.

(8.15.2.16) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

☒ Yes, progress is collectively monitored using a shared external framework, please specify :The Black Bayou initiative conducts the monitoring of activities.

(8.15.2.17) State the achievements of your engagement so far and how progress is monitored

We bring funding to this local initiative.

(8.15.2.18) Claims made

Select from:

☒ No, we are not making any claims, and we do not plan to within the next two years

[Add row]

(8.15.3) For each of your disclosed commodities, provide details on the disclosure volume from each of the landscapes/jurisdictions you engage in.

Row 1

(8.15.3.1) Landscape/jurisdiction ID

Select from:

☒ LJ1

(8.15.3.2) Does any of your produced and/or sourced commodity volume originate from this landscape/jurisdiction, and are you able/willing to disclose information on this volume?

Select from:

☒ Yes, we do produce/source from this landscape/jurisdiction, but we are not able/willing to disclose volume data

Row 2

(8.15.3.1) Landscape/jurisdiction ID

Select from:

☒ LJ2

(8.15.3.2) Does any of your produced and/or sourced commodity volume originate from this landscape/jurisdiction, and are you able/willing to disclose information on this volume?

Select from:

☒ Yes, we do produce/source from this landscape/jurisdiction, but we are not able/willing to disclose volume data

Row 3

(8.15.3.1) Landscape/jurisdiction ID

Select from:

☒ LJ3

(8.15.3.2) Does any of your produced and/or sourced commodity volume originate from this landscape/jurisdiction, and are you able/willing to disclose information on this volume?

Select from:

☒ Yes, we do produce/source from this landscape/jurisdiction, but we are not able/willing to disclose volume data

[Add row]

(8.16) Do you participate in any other external activities to support the implementation of policies and commitments related to deforestation, ecosystem conversion, or human rights issues in commodity value chains?

Select from:

☒ Yes

(8.16.1) Provide details of the external activities to support the implementation of your policies and commitments related to deforestation, ecosystem conversion, or human rights issues in commodity value chains

Row 1

(8.16.1.1) Commodity

Select all that apply

☒ Timber products

(8.16.1.2) Activities

Select all that apply

☒ Involved in industry platforms

☒ Engaging with communities

☒ Engaging with non-governmental organizations

☒ Funding research organizations

(8.16.1.3) Country/area

Select from:

☒ United States of America

(8.16.1.4) Subnational area

Select from:

☒ Please specify :GA, LA

(8.16.1.5) Provide further details of the activity

In partnership with the Forest Stewards Guild, we distributed educational resources to wood suppliers with a specific focus on late successional bottomland hardwoods. The Guild offers a set of high quality educational tools centered on invasive plant management and impacts of climate on late successional bottomland hardwoods specific to the alluvial Coastal Plains and Mississippi Alluvial Valley where Graphic Packaging sources. As we closely track land use and forest cover trends in our supply basins, Graphic Packaging makes an annual contribution to the Georgia-Alabama Land Trust which works to protect forest and woodlands against threats from development and other factors by using conservation easements fee acquisitions and partnership conservation agreements to protect lands in the supply basins in which Graphic Packaging sources wood. We also support AFF's American Tree Farm System (ATFS) program to provide family landowners with the resources they need to maintain their forests and be effective stewards of the land. Similarly, we work in collaboration with the SFI SICs in the states we operate in to provide training field days and technical support to engage family landowners in forest conservation because we know engagement is critical to forest

stewardship and retention. Lastly, working across priorities, Graphic Packaging employees are actively involved with the SFI at all levels to advance and drive an array of impacts. The company’s CEO Mike Doss served as the Board Chair for SFIs Board of Directors helping to steer the direction of the organization including 2024 initiatives focused on Indigenous relations enhancing and expanding the conservation impact of SFIs programs and combating climate change. Recognizing the importance of maintaining vibrant forests in the Southeast, we are exploring additional partnership opportunities to advance our commitment to forestland conservation in our supply basins.

[Add row]

(8.17) Is your organization supporting or implementing project(s) focused on ecosystem restoration and long-term protection?

Select from:

☒ Yes

(8.17.1) Provide details on your project(s), including the extent, duration, and monitoring frequency. Please specify any measured outcome(s).

Row 1

(8.17.1.1) Project reference

Select from:

☒ Project 1

(8.17.1.2) Project type

Select from:

☒ Forest ecosystem restoration

(8.17.1.3) Expected benefits of project

Select all that apply

☒ Compliance with certification

(8.17.1.4) Is this project originating any carbon credits?

Select from:

☒ No

(8.17.1.5) Description of project

For many years, the company has partnered with the Georgia Alabama Land Trust to engage forest owners in conservation easements to retain forests within our supply basins in forest land use. Since 2020, the organization has protected more than 50,000 acres through donated, USDA NRCS and purchased easements in AL and GA. As we observe changes in forest are, we are excited to support AFF's Field to Forest program, which engages family landowners in Georgia by planting region-specific loblolly pine seedlings on marginally productive or difficult to manage pastures or croplands. The program matches landowners with professional foresters and contractors who help write planting plans suited to the land's condition and coordinate the planting process from start to finish – including site preparation, planting seedlings, and post planting maintenance. These newly established forests will also provide vital habitats, especially at the edges of forests and pastures, which are important habitats for an array of species.

(8.17.1.6) Where is the project taking place in relation to your value chain?

Select all that apply

☒ Project based in area with direct operations

☒ Project based in sourcing area(s)

(8.17.1.7) Start year

2019

(8.17.1.8) Target year

Select from:

☒ Other, please specify :This work is ongoing.

(8.17.1.11) Country/Area

Select from:

☒ United States of America

(8.17.1.14) Monitoring frequency

Select from:

☒ Annually

(8.17.1.16) For which of your expected benefits are you monitoring progress?

Select all that apply

☒ Compliance with certification

(8.17.1.17) Please explain

The new AFF project leverages grassroots local engagement to identify landowners who are eligible and have land suitable for afforestation/reforestation. Recruitment to forests is an important step, as forests become more precious in the context of land use and climate change. For the Georgia-Alabama Land Trust, the aim is to protect and steward nearly 1,300 conservation properties totaling over 478,000 acres into perpetuity. This means the land will never transition out of forest or other ecosystem with the result of forest land retention and ecosystem conservation. Within this stewardship, is a focus to preserve even more critical wildlife habitat, prime soil, and other important lands that make the Southeast a special place.

[Add row]

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☒ No

(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Water meters and utility invoices

(9.2.4) Please explain

Graphic Packaging monitors our water withdrawals and discharges monthly at all paperboard manufacturing facilities and packaging plants across our global operational footprint boundary using water meters for direct measurements and utility invoices. The paperboard manufacturing facilities represent the largest component of our water withdrawals and discharges.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Water meters and utility invoices

(9.2.4) Please explain

Graphic Packaging monitors our water withdrawals and discharges monthly at all paperboard manufacturing facilities and packaging plants across our global operational footprint boundary using water meters for direct measurements and utility invoices. The paperboard manufacturing facilities represent the largest component of our water withdrawals and discharges.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Onsite Water quality testing; municipal water supply quality reports

(9.2.4) Please explain

Graphic Packaging monitors water quality in onsite labs at our paperboard manufacturing facilities and some packaging plants for direct water withdrawals. As an example, the Macon facility tests the pH conductivity and temperature from 1 of the 2 active wells. This groundwater source is monitored on a monthly and annual basis to comply with permit requirements. In addition, there is daily monitoring of the intake flow and turbidity, which is monitored for the boiler feed. Purchased municipal water quality is monitored via municipal water supply water quality reports.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Water meters and utility invoices

(9.2.4) Please explain

Graphic Packaging monitors our water withdrawals and discharges monthly at all paperboard manufacturing facilities and packaging plants across our global operational footprint boundary using water meters for direct measurements and utility invoices. The paperboard manufacturing facilities represent the largest component of our water withdrawals and discharges.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Water meters and utility invoices

(9.2.4) Please explain

Graphic Packaging monitors our water withdrawals and discharges monthly at all paperboard manufacturing facilities and packaging plants across our global operational footprint boundary using water meters for direct measurements and utility invoices. The paperboard manufacturing facilities represent the largest component of our water withdrawals and discharges.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Water meters and utility invoices

(9.2.4) Please explain

Graphic Packaging monitors our water discharge at our paperboard manufacturing facilities and packaging facilities. Volumes of water discharge by treatment method is monitored and measured in accordance with permit requirements (typically at the paperboard manufacturing facilities); Graphic Packaging reports the results as part of our permit reports. Graphic Packaging has established KPIs and monitors our water discharge at all paperboard manufacturing facilities on a monthly and

annual basis. The paperboard manufacturing facilities represent the largest component of our water discharges. The quantitative analysis has been generated from our monitoring activities. Graphic Packaging paperboard manufacturing facilities treat water before discharge to the local water treatment facility and/or directly to the river.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☒ 1-25

(9.2.2) Frequency of measurement

Select from:

☒ Other, please specify :Monthly at paperboard manufacturing facilities. Varies at packaging facilities depending on permit requirements (ex. Yearly, quarterly, etc.)

(9.2.3) Method of measurement

Onsite Water quality testing

(9.2.4) Please explain

Tracking of water discharge quality at each of our facilities varies somewhat based on what is required to be monitored and managed under each facility's government-issued permit. Graphic Packaging monitors water discharge quality monthly at paperboard manufacturing facilities and several packaging facilities, representing over 98% of total water discharged. We will evaluate whether to incorporate monthly discharge monitoring at any additional packaging plant locations. Most if not all of our remaining facilities are required to meet discharge authorization limits for standard water quality measures. Water discharge quality at monitored facilities is measured in accordance with permit requirements, and results are reported as part of permit reports. Standard tracked parameters may include Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), and pH levels. Waste water treatment systems at the wood paperboard facilities are primarily designed to reduce TSS and BOD.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☒ 1-25

(9.2.2) Frequency of measurement

Select from:

☒ Other, please specify :Monthly at paperboard manufacturing facilities. Varies at packaging facilities depending on permit requirements (ex. Yearly, quarterly, etc.)

(9.2.3) Method of measurement

Onsite water quality testing

(9.2.4) Please explain

Tracking of water pollutants at each of our facilities varies somewhat based on what is required to be monitored and managed under each facility's government-issued permit. Graphic Packaging monitors our water discharge quality for specific compound emissions monthly at our paperboard manufacturing facilities, representing over 98% of total water discharged. Most if not all of our remaining facilities are required to meet discharge authorization limits for pollutants that can be discharged into their effluent to municipal treatment systems. We will evaluate whether to incorporate monthly discharge monitoring at any additional packaging plant locations. Examples of the type of pollutants tracked may include Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), adsorbable organic halides (AOX), ammonia- nitrogen, dioxin, pH, phosphorus, aluminum, and dissolved oxygen concentration.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☒ 1-25

(9.2.2) Frequency of measurement

Select from:

☒ Other, please specify :Weekly at paperboard manufacturing facilities. Varies at packaging facilities depending on permit requirements (ex. Yearly, quarterly, etc.)

(9.2.3) Method of measurement

(9.2.4) Please explain

Water discharge temperature is monitored and measured in accordance with permit requirements; Graphic Packaging reports the results if required by permits.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Yearly

(9.2.3) Method of measurement

Water meters and utility invoices

(9.2.4) Please explain

Graphic Packaging monitors our water withdrawals and discharge at our paperboard manufacturing and packaging plant operations. For the purposes of CDP reporting, we measure net consumption volume by subtracting water discharges from water withdrawals on an annual basis. The paperboard facilities represent 98% of water discharges.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☒ Not monitored

(9.2.4) Please explain

Graphic Packaging recycles a significant portion of process in the paperboard manufacturing facilities water through recirculation in short loops. Graphic Packaging is working to calculate its recycled water metrics but significant obstacles remain; namely, we have several different types of facilities, in some cases water is recycled multiple times, and many of our facilities are not equipped to adequately measure these flows. Graphic Packaging has identified this as a key improvement area and is endeavoring to enhance tracking of recycled water in the future.

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Other, please specify :Every 3 Years or Less

(9.2.3) Method of measurement

SMETA Audits

(9.2.4) Please explain

WASH services are provided in compliance with all local laws and regulations. Furthermore, all Graphic Packaging-owned packaging plants undergo SMETA audits every three years. Currently, we are working to incorporate recently acquired sites and our paperboard manufacturing facilities into this audit cadence.
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

145900

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Much lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Other, please specify :Divestiture of the Augusta paperboard manufacturing facility

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Other, please specify :Divestiture of the Augusta paperboard manufacturing facility

(9.2.2.6) Please explain

Consistent with the prior year, water withdrawal includes influent water in addition to other water inputs, which include stormwater runoff that enters our wastewater treatment processes at the paperboard manufacturing facilities, produced water (also referred to as raw material water), and third-party tertiary treated wastewater. In May 2024 we sold our Augusta paperboard manufacturing facility to Clearwater Paper, which represented over 35% of our water withdrawal footprint. This led to a year-over-year reduction in total water withdrawal of 19%. We expect our water withdrawal totals to decrease even further (10-15%) next year since Augusta will be excluded from our water footprint for the full year. The other reason we expect water withdrawals to decrease over a five year period is that we have undertaken a multi-year project to optimize our CRB manufacturing portfolio and implement process improvements, which includes increasing production efficiency at the new Kalamazoo K2 paper machine, decommissioning older recycled fiber production lines (such as the Middletown facility and Kalamazoo K3 paper machine), and progressing on construction at the new Waco recycled fiber facility. Much lower / much higher is defined as a % change of 15% or more.

Total discharges

(9.2.2.1) Volume (megaliters/year)

111400

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Much lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Other, please specify :Divestiture of the Augusta paperboard manufacturing facility

(9.2.2.4) Five-year forecast

Select from:

☒ Much lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Other, please specify :Divestiture of the Augusta paperboard manufacturing facility

(9.2.2.6) Please explain

Due to the sale of our Augusta paperboard manufacturing facility in May of 2024, total 2024 water effluent discharges were approximately 26% lower than 2023 volumes. We anticipate total water discharge to decrease even further (15+%) next year since Augusta will be excluded from our water footprint for the full year. Over the next 5 years, we anticipate total water discharge decreasing due to the sale of our Augusta facility and the work to optimize our CRB manufacturing portfolio. Much lower / much higher is defined as a % change of 15% or more.

Total consumption

(9.2.2.1) Volume (megaliters/year)

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Much higher**(9.2.2.3) Primary reason for comparison with previous reporting year**

Select from:

☒ Other, please specify :We experienced very high precipitation at our paperboard manufacturing facilities in 2024, causing an increase in stormwater runoff**(9.2.2.4) Five-year forecast**

Select from:

☒ About the same**(9.2.2.5) Primary reason for forecast**

Select from:

☒ Other, please specify :No planned changes in operating methodology.**(9.2.2.6) Please explain**

For the purposes of CDP reporting, we measure net consumption volume by subtracting water discharges from total water influent (including produced water, third party tertiary-treated water, and stormwater runoff that enters our process) on an annual basis. Overall consumption increased year over year by approximately 5,000 ML. The reason for the increase in consumption is due to high levels of precipitation at our paperboard manufacturing facilities causing an increase in estimated captured stormwater runoff of approximately 7,000 ML year over year. Additionally, one of our paperboard manufacturing facilities is only permitted to discharge to surface water during certain portions of the year. In 2024 this permitting caused their withdrawals to significantly exceed discharges, and caused an increase in onsite water storage of close to 5,000 ML. Since this facility accounts for approximately half of Graphic Packaging's total water withdrawals, it resulted in higher total consumption for the Company as a whole. Much lower / much higher is defined as a % change of 15% or more.

[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:

☒ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

280

(9.2.4.3) Comparison with previous reporting year

Select from:

☒ Much lower

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☒ Facility closure

(9.2.4.5) Five-year forecast

Select from:

☒ Higher

(9.2.4.6) Primary reason for forecast

Select from:

☒ Other, please specify :Expected increase due to projected increase in water stressed areas by 2030 according to WRI Aqueduct

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

0.19

(9.2.4.8) Identification tool

Select all that apply

☒ WRI Aqueduct

(9.2.4.9) Please explain

The WRI Aqueduct tool was used to assess the proportion of withdrawal associated with sites that are located in river basins that are considered as having high or extremely high baseline water stress. The 2024 analysis identified 29 packaging plant locations in watersheds with either high or extremely high predicted baseline stress levels. Total water withdrawals from water stressed areas decreased approximately 24% from 2023 to 2024, due to the closure of two facilities in high water stress areas in late 2023 / early 2024. No paperboard manufacturing facilities were identified as being in high or extremely high predicted baseline stress levels. These facilities account for approximately 0.25% of Graphic Packaging's total direct water withdrawals (excluding influent water from materials, stormwater, and third-party treated tertiary water)
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

93100

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ Much lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Other, please specify :Divestiture of the Augusta paperboard manufacturing facility

(9.2.7.5) Please explain

Most surface water withdrawals (99%) occur at our wood-based paperboard manufacturing facilities. These facilities use pumps where the flow cannot be easily adjusted. At least one wood-based paperboard facility withdraws more surface water than is needed for use, but the site has not yet found a solution for how to decrease the pump flow, so most of this water is discharged back to the surface water body without being used. Graphic Packaging defines "Much higher/much lower" as a change in excess of +/-15%.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

Brackish surface water/seawater is not used as a water source for Graphic Packaging.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

Graphic Packaging has reclassified all groundwater withdrawals as nonrenewable at this time as the extracted groundwater is not returned to the source aquifer and aquifer recharge areas are unknown.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

12200

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Other, please specify :Several of our large paperboard manufacturing facilities used less groundwater and more surface water / potable water

(9.2.7.5) Please explain

Groundwater – non-renewable was withdrawn at 11 sites in 2024. It is used as both process and non-contact cooling water in our operations. The year over year volume decreased about 9%, mainly due a reduction in groundwater withdrawals at our Kalamazoo paperboard manufacturing facility (withdrawals from third-party sources increased at Kalamazoo,, so total water withdrawal increased slightly). Graphic Packaging defines "Much higher/much lower" as a change in excess of +/- 15%.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ Lower**(9.2.7.4) Primary reason for comparison with previous reporting year**

Select from:

☒ Other, please specify :Divestiture of the Augusta paperboard manufacturing facility**(9.2.7.5) Please explain**

Graphic Packaging estimates produced water through a calculation of estimated moisture content of wood chips as a percentage of estimated wood chips brought into the wood-based paperboard manufacturing facilities. The year over year produced water usage decreased by approximately 500 ML or 13% due to the sale of the Augusta, GA paperboard manufacturing facility in May 2024. Graphic Packaging defines "Much higher/much lower" as a change in excess of +/- 15%. Produced water is considered influent water, not an active water withdrawal, and is therefore not included in water withdrawal totals.

Third party sources**(9.2.7.1) Relevance**

Select from:

☒ Relevant**(9.2.7.2) Volume (megaliters/year)**

11300

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Other, please specify :No major change in operations that use these water sources.

(9.2.7.5) Please explain

*Graphic Packaging tracks the withdrawal of municipal grey water and municipal potable water using utility invoices. Withdrawal of municipal potable water increased about 400 ML or 7% (from 5,000 ML in 2022 to 5,400 ML in 2024). Additionally, one of our paperboard manufacturing facilities accepts third-party tertiary treated water from the local municipality, which represents 5,9 ML in 2024 (down from 5,800 ML in 2023). Total withdrawal / influent from third party sources was relatively flat year over year. Graphic Packaging defines "Much higher/much lower" as a change in excess of +/- 15%.
[Fixed row]*

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters/year)

109300

(9.2.8.3) Comparison with previous reporting year

Select from:

☒ Much lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Other, please specify :Divestiture of the Augusta paperboard manufacturing facility

(9.2.8.5) Please explain

As part of improved tracking of water discharges, we have determined that 100% of the water discharged by our paperboard manufacturing facilities is ultimately discharged to fresh, surface water systems either directly at our paperboard manufacturing facilities or by third-party treatment facilities. This represents approximately 98% of our total water discharged. Total 2024 surface water effluent discharges were approximately 26% lower than 2023 volumes. This was largely due to the sale of the Augusta, GA paperboard manufacturing facility in May 2024 and changes at our paperboard manufacturing facilities, including the implementation of the West Monroe whitewater return line, on-site surface water retention at our Macon facility. Graphic Packaging defines "Much higher/much lower" as a change in excess of +/- 15%.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☒ Not relevant

(9.2.8.5) Please explain

Brackish surface water/seawater is not used as a water source or discharge destination for Graphic Packaging.

Groundwater

(9.2.8.1) Relevance

Select from:

☒ Not relevant

(9.2.8.5) Please explain

Less than .01% of Graphic Packaging's discharge goes back to groundwater.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters/year)

2100

(9.2.8.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Other, please specify :No significant changes to operations.

(9.2.8.5) Please explain

All remaining process water is discharged through third parties, which are primarily municipal facilities. In 2024, 100% of paperboard manufacturing water discharge was ultimately allocated to fresh, surface water systems either directly at our paperboard manufacturing facilities or by third-party treatment facilities. We track discharge of third party wastewater to local municipalities through invoices. Additionally, one paperboard manufacturing facility supplies treated potable water to the local community, accounting for approximately 71% of all third-party water discharges. Overall discharge volumes increased by approximately 5% due to an increase in potable water supplied to the local municipality. Graphic Packaging defines "Much higher/much lower" as a change in excess of +/- 15%.

[Fixed row]

(9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

(9.2.9.6) Please explain

No tertiary treatment at our facilities.

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

91400

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ Much lower

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Other, please specify :Divestiture of the Augusta paperboard manufacturing facility

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ 1-10

(9.2.9.6) Please explain

At our wood-based paperboard facilities, any water that is discharged to surface water is subject to both primary and secondary treatment before discharge. This amount represents approximately 82% of total water discharges. As mentioned in Q9.2.2.6, this is lower than 2023 due to the sale of our Augusta paperboard manufacturing facility in May of 2024. Graphic Packaging defines "Much higher/much lower" as a change in excess of +/- 15%

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant but volume unknown

(9.2.9.6) Please explain

Water discharged directly to surface water undergoes both primary and secondary treatment.

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

(9.2.9.6) Please explain

All process water is treated prior to being discharged directly to surface water systems.

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ Lower**(9.2.9.4) Primary reason for comparison with previous reporting year**

Select from:

☒ Divestment from water intensive technology/process**(9.2.9.5) % of your sites/facilities/operations this volume applies to**

Select from:

☒ 81-90**(9.2.9.6) Please explain**

At our packaging plants, water is withdrawn from and discharged to the local municipalities without treatment. This represents less than 1% of total water discharge. Graphic Packaging defines "Much higher/much lower" as a change in excess of +/- 15%. Water discharged to a third party without treatment decreased approximately 6% year over year. The primary reason was the removal of two water-cooled air compressors from service at one packaging facility.

Other**(9.2.9.1) Relevance of treatment level to discharge**

Select from:

☒ Relevant**(9.2.9.2) Volume (megaliters/year)**

19400

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ About the same

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Unknown

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ 1-10

(9.2.9.6) Please explain

Other discharges includes treated potable water provided to local communities, and water that undergoes partial treatment at paperboard manufacturing facilities prior to being discharged to the local municipality for additional treatment. Graphic Packaging defines "Much higher/much lower" as a change in excess of +/- 15%.

[Fixed row]

(9.2.10) Provide details of your organization's emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.

(9.2.10.1) Emissions to water in the reporting year (metric tons)

42

(9.2.10.2) Categories of substances included

Select all that apply

☒ Nitrates

(9.2.10.4) Please explain

Tracking of water pollutants at each of our facilities varies somewhat based on what is required to be monitored and managed under each facility's government-issued permit. Graphic Packaging monitors our water discharge quality for specific compound emissions monthly at our paperboard manufacturing facilities. Most if not all of our remaining facilities are required to meet discharge authorization limits for certain pollutants that can be discharged into their effluent to municipal treatment systems. Examples of the type of pollutants tracked may include Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), adsorbable organic halides (AOX), ammonia- nitrogen, dioxin, pH, phosphorus, aluminum, and dissolved oxygen concentration. Emissions tracked in 2024 include ammonia-nitrogen, classified here as nitrates. Emissions decreased year over year due to the sale of our Augusta paperboard manufacturing facility and the lack of data for Augusta for all of 2024. Additionally, certain sites reported emissions of nitrates and phosphates in 2023, but annual monitoring of these emissions is not required.
[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:

☒ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

6

(9.3.3) % of facilities in direct operations that this represents

Select from:

☒ 1-25

(9.3.4) Please explain

Through our risk management process, Graphic Packaging assigns a quantitative score to define a potential substantive financial or strategic impact for each risk/opportunity as follows: a risk magnitude impact factor of 1-5 (with the number corresponding to a range of financial impacts with 1 being low impact and 5 being high impact), and a risk probability impact factor of 1-5 (with risk level 1 corresponding to a risk that rarely occurs within a two-year time period and level 5 corresponding to a risk that is almost certain to occur within a two-year time period). When risk magnitude (financial impact) is multiplied by risk probability (likelihood of the event) and this results in a figure equal to or higher than 10, a risk/opportunity is considered to have a substantive financial or strategic impact. Based on

Graphic Packaging's methodology for assessing substantive financial or strategic impact, the paperboard manufacturing operations have the potential to have a substantive IRO, however at this time there are no substantive impacts. All facilities are in watersheds with adequate supply and operate under water discharge permits designed to protect receiving waterbodies.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☒ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

(9.3.4) Please explain

Regarding our upstream value chain, the Company primarily relies on private landowners and the open market for all of its pine and hardwood pulp and recycled fiber requirements, supplemented by clippings that are obtained from its packaging facility operations. The Company believes that adequate supplies from both private landowners and open market fiber sellers currently are available in close proximity to meet its fiber needs at these paperboard manufacturing facilities. We have not yet undertaken an assessment for the rest of the upstream value chain.
[Fixed row]

(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Row 1

(9.3.1.1) Facility reference number

Select from:

☒ Facility 1

(9.3.1.3) Value chain stage

Select from:

☒ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

- ☒ Yes, withdrawals and discharges

(9.3.1.10) Located in area with water stress

Select from:

- ☒ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

20950

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

- ☒ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

18933

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

513

(9.3.1.19) Withdrawals from produced/entrained water

931

(9.3.1.20) Withdrawals from third party sources

572

(9.3.1.21) Total water discharges at this facility (megaliters)

15378

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Lower

(9.3.1.23) Discharges to fresh surface water

15378

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

(9.3.1.27) Total water consumption at this facility (megaliters)

5566

(9.3.1.28) Comparison of total consumption with previous reporting year*Select from:*☒ Much higher**(9.3.1.29) Please explain**

The main reason for the increase in consumption is due to increased levels of precipitation causing an increase in estimated captured stormwater runoff at all three of these facilities. While some of this stormwater runoff is discharged, we are not able to accurately estimate and account for evaporation from these ponds. Much lower / much higher is defined as a % change of +/-15% or more.

Row 2**(9.3.1.1) Facility reference number***Select from:*☒ Facility 2**(9.3.1.3) Value chain stage***Select from:*☒ Direct operations**(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility***Select all that apply*☒ Impacts☒ Risks☒ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

(9.3.1.10) Located in area with water stress

Select from:

☒ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

67023

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

65830

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

1193

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

47885

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Lower

(9.3.1.23) Discharges to fresh surface water

47885

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

19115

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Much higher

(9.3.1.29) Please explain

The main reason for the increase in withdrawals and consumption is due to high levels of precipitation causing an increase in estimated captured stormwater runoff. Additionally, this facility is only permitted to discharge to surface water during certain portions of the year. In 2024 this permitting caused their withdrawals to significantly exceed discharges and caused a significant increase in onsite water storage. We are also not able to accurately estimate and account for evaporation from these ponds. Much lower / much higher is defined as a % change of +/-15% or more.

Row 3

(9.3.1.1) Facility reference number

Select from:

☒ Facility 3

(9.3.1.3) Value chain stage

Select from:

☒ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

☒ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

(9.3.1.10) Located in area with water stress

Select from:

☒ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

30200

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

14346

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

8915

(9.3.1.19) Withdrawals from produced/entrained water

1057

(9.3.1.20) Withdrawals from third party sources

5882

(9.3.1.21) Total water discharges at this facility (megaliters)

23573

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

23573

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

6619

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Much higher

(9.3.1.29) Please explain

The main reason for the increase in consumption is due to increased levels of precipitation causing an increase in estimated captured stormwater runoff at all three of these facilities. While some of this stormwater runoff is discharged, we are not able to accurately estimate and account for evaporation from these ponds. Much lower / much higher is defined as a % change of +/-15% or more.

[Add row]

(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Our auditors review whether our water data is in accordance with GRI: Global Reporting Initiative for Scope 1 (305-1), Scope 2 (305-2), Scope 3 (305-3), Energy Consumption (302-1), Water Withdrawal (303-3), and Water Discharge (303-4). They also ensure that their verification procedure is based on current best practice and is in accordance with ISAE 3000 and ISAE 3410.

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Our auditors review whether our water data is in accordance with GRI: Global Reporting Initiative for Scope 1 (305-1), Scope 2 (305-2), Scope 3 (305-3), Energy Consumption (302-1), Water Withdrawal (303-3), and Water Discharge (303-4). They also ensure that their verification procedure is based on current best practice and is in accordance with ISAE 3000 and ISAE 3410.

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

Graphic Packaging does not complete verification for withdrawal water quality.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Our auditors review whether our water data is in accordance with GRI: Global Reporting Initiative for Scope 1 (305-1), Scope 2 (305-2), Scope 3 (305-3), Energy Consumption (302-1), Water Withdrawal (303-3), and Water Discharge (303-4). They also ensure that their verification procedure is based on current best practice and is in accordance with ISAE 3000 and ISAE 3410.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Our auditors review whether our water data is in accordance with GRI: Global Reporting Initiative for Scope 1 (305-1), Scope 2 (305-2), Scope 3 (305-3), Energy Consumption (302-1), Water Withdrawal (303-3), and Water Discharge (303-4). They also ensure that their verification procedure is based on current best practice and is in accordance with ISAE 3000 and ISAE 3410.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

Graphic Packaging does not complete verification for discharge treatment method for water quality.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

Graphic Packaging does not complete verification for discharge treatment method for water quality.

Water consumption – total volume

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Our auditors review whether our water data is in accordance with GRI: Global Reporting Initiative for Scope 1 (305-1), Scope 2 (305-2), Scope 3 (305-3), Energy Consumption (302-1), Water Withdrawal (303-3), and Water Discharge (303-4). They also ensure that their verification procedure is based on current best practice and is in accordance with ISAE 3000 and ISAE 3410.

[Fixed row]

(9.5) Provide a figure for your organization’s total water withdrawal efficiency.

(9.5.1) Revenue (currency)

8807000000

(9.5.2) Total water withdrawal efficiency

60363.26

(9.5.3) Anticipated forward trend

In early 2024, Graphic Packaging retired its Vision 2025 water goal and did not set a new goal to better focus company efforts on achieving its near-term SBTs. Water use is directly tied to energy use in the paperboard manufacturing facilities, and efforts to increase energy efficiency will likely also increase water use efficiency. Modest improvements in water withdrawal efficiency are anticipated in the future.

[Fixed row]

(9.12) Provide any available water intensity values for your organization’s products or services.

Row 1

(9.12.1) Product name

Paperboard Water Withdrawal Intensity

(9.12.2) Water intensity value

0.034

(9.12.3) Numerator: Water aspect

Select from:
☒ Water withdrawn

(9.12.4) Denominator

Metric Tons Saleable Paperboard

(9.12.5) Comment

Graphic Packaging reports paperboard withdrawal water intensity in our ESG report to reflect operations use of new water withdrawn from the local watershed. The paperboard facilities represent >98% of the water used in our operations.
[Add row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(9.13.1) What percentage of your company’s revenue is associated with products containing substances classified as hazardous by a regulatory authority?

Row 1

(9.13.1.1) Regulatory classification of hazardous substances

Select from:

☒ Other, please specify :This does not apply to our products

(9.13.1.2) % of revenue associated with products containing substances in this list

Select from:

☒ Don't know

(9.13.1.3) Please explain

Our products may contain trace amounts of some substances listed as hazardous by regulatory authorities, but any levels present would be well below applicable regulatory requirements. We screen all process chemicals used in paperboard production and assess all our products for safety and compliance through end use. Each chemical used in the paperboard manufacturing process goes through a comprehensive occupational safety and environmental assessment and a detailed inspection to ensure they meet applicable regulatory requirements. Because our paperboard is commonly used in food packaging applications, our products must comply with applicable food safety regulations. Our facilities follow globally recognized standards including the British Retail Consortium standards, Food Safety Systems Certification 22000, and the Safe Quality Food Program. Direct food contact materials are regulated throughout most of the world. Our corporate product stewardship team reviews product safety properties, striving for material compliance with relevant regulations in the main markets where Graphic Packaging products are sold.

[Add row]

(9.14) Do you classify any of your current products and/or services as low water impact?

(9.14.1) Products and/or services classified as low water impact

Select from:

☒ No, and we do not plan to address this within the next two years

(9.14.3) Primary reason for not classifying any of your current products and/or services as low water impact

Select from:

☒ Other, please specify :Lack of standardization and rigor in defining “low water impact”

(9.14.4) Please explain

Graphic Packaging believes that there currently exists a lack of standardization and rigor in defining packaging products and services that are “low water impact.” Based on current WRI water risk assessments, our product manufacturing processes do not impact stakeholder access to water in the watersheds where we operate.
[Fixed row]

(9.15) Do you have any water-related targets?

Select from:

☒ No, and we do not plan to within the next two years

(9.15.3) Why do you not have water-related target(s) and what are your plans to develop these in the future?

(9.15.3.1) Primary reason

Select from:

☒ Judged to be unimportant, explanation provided

(9.15.3.2) Please explain

Our paperboard manufacturing facilities account for more than 98% of the Company’s total withdrawn and discharged water volumes. We are fortunate that these facilities are located in watersheds with sufficient supply to meet the needs of all local water stakeholders, and that access to water does not currently present a material risk to our operations in these regions. Therefore, in early 2024, Graphic Packaging retired its Vision 2025 water goal and did not set a new goal to better focus company efforts on achieving its near-term SBTs. At this time, we do not plan to set a replacement water goal and will address water use reductions as part of our Better by 2030 Climate Action goals. As part of routine continuous improvement activities, our paperboard manufacturing facilities seek opportunities to reduce the amount of water withdrawn from local resources, and work to responsibly return the water they borrow back to the environment.
[Fixed row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☒ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☒ Land/water protection

☒ Land/water management

☒ Species management

☒ Education & awareness

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	<p>Select from:</p> <p><input checked="" type="checkbox"/> Yes, we use indicators</p>	<p>Select all that apply</p> <p><input checked="" type="checkbox"/> State and benefit indicators</p> <p><input checked="" type="checkbox"/> Pressure indicators</p>

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
		<input checked="" type="checkbox"/> Response indicators <input checked="" type="checkbox"/> Other, please specify :GIS and NatureServe tools, state natural heritage and best management practice (BMP) reports, and partnering with conservation organizations

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Yes

(11.4.2) Comment

There are several areas important for biodiversity that exist within Graphic Packaging's wood sourcing area. Many of these are under federal or state protection and management. Or, on private lands, these areas may be influenced by our partnerships with NGOs or our sourcing program, which includes specific strategies to protect and enhance biodiversity. Several important legally protected areas are located within the supply basins for Graphic Packaging's US operations. Many of these serve as important habitats and refugia for biodiversity. These areas include Shugart/Felsenthal Natl Wildlife Refuge - Warren Prairie Natural Area - East Kiasatchie - Walter B. Jacobs Memorial Nature Park - Catahoula-Dewey Wills-Three Rivers - Fort Stewart Military Installation - Altamaha Waterfowl Mgmt Area - Okefenokee Natl Wildlife Refuge - Piedmont Natl Wildlife Refuge - Pinizy Swamp - Fort Jackson and several others. These sites are protected by local, state, and federal partners and are generally managed under conservation objectives. Furthermore, any harvesting activities are undertaken with the goal of habitat or ecosystem restoration. Graphic Packaging recognizes and supports the conservation of these important wildlife areas. The Black Bayou National Wildlife Refuge lies just east of our West Monroe facility; we are long time partners of the Black Bayou Conservation Initiative, to preserve and protect a variety of habitats in the ecosystem including for waterfowl and neo-tropical migratory birds. Bottomland hardwood forests in this region support a spectrum of species including prothonotary warblers, while bald cypress swamps harbor broad-banded water snakes, a multitude of frogs, and iconic species such as the American alligator, anhingas (large darter birds), and great blue herons.

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Yes

(11.4.2) Comment

There is just one UNESCO World Heritage site that falls within Graphic Packaging's sourcing regions within the US: Monumental Earthworks of Poverty Point in West Carroll parish, in the State of Louisiana. The site consists of an integrated complex of earthen monuments, in the main constructed 3,700-3,100 years ago in the Late Archaic period. The Poverty Point complex is recognized internationally as an important site not just because of its scale, the integration of the earthworks and the extent to which the complex is intact, but crucially because it was built by hunter-fisher-gatherers. This area is protected and managed by the State of Louisiana as a state historic site open to the public since 1972; any harvesting of wood would be very limited and for the specific purposes of preservation of the historic site. Like all special sites, Graphic Packaging respects, recognizes, and protects protected cultural sites.

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Yes

(11.4.2) Comment

Several UNESCO Biosphere Reserves are identified within Graphic Packaging's broader US sourcing area: Carolinian-South Atlantic Biosphere Reserve (North Carolina, South Carolina, Georgia); Central Gulf Coastal Plain Biosphere Reserve (Florida); South Atlantic Coastal Plain Biosphere Reserve (South Carolina). These sites are made up of a constellation of protected lands which are generally managed by state and federal government partners, along transition and economic zones. Forest economy activities are a central consideration for Biosphere Reserve designations, and Graphic Packaging is proud to be a part both of the protection and the local livelihood support aspects of the Biosphere Reserves in this region.

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Yes

(11.4.2) Comment

We assessed our wood sourcing areas relative to the Ramsar list as published for the United States (<https://www.ramsar.org/country-profile/united-states-america>). The sites in proximity to our sourcing areas include the following: For Texarkana: Caddo Lake, a Texas state park and wildlife management area, a site recognized for hallow, heavily vegetated waters of the lake, its sloughs, swamps, backwaters, and hardwood forests. With support from musician Don Henley, the site is RAMSAR recognized and is protected and managed for wildlife and recreational purposes; any harvesting activities would be for the purposes of sustaining these values.. For West Monroe: Catahoula Lake National Wildlife Refuge, centered on a lake is fed by the Little River and numerous smaller water courses and is subject to back-flooding. The site is managed by the federal government for wildlife populations and habitat; any harvesting activity is undertaken with the goal of habitat or ecosystem restoration. For Macon: Okefenokee National Wildlife Refuge. The site, is an extensive drainage basin on the divide between the Atlantic Ocean and Gulf of Mexico, characterized by swamp forest. The site is managed by the federal government for wildlife populations and habitat; any harvesting activities are undertaken with the goal of habitat or ecosystem. Graphic Packaging recognizes and supports the conservation of these important wildlife areas.

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Yes

(11.4.2) Comment

Graphic Packaging has conducted an analysis of the Key Biodiversity Areas located within the sourcing regions of its wood-based paperboard manufacturing facilities. This analysis is revisited annually and updated. Several Key Biodiversity Areas (KBAs) are located within the regions of Graphic Packaging's supply basins. Each of these sites has been reviewed for potential impacts. These sites are all under management by the US federal government, the state government or a county/parish in Arkansas, Georgia, South Carolina or Louisiana. All of these sites are managed with the objective of conservation and/or are under protection by law. Additionally, the triggering species for these sites is often, though not always, an aquatic bird species or not associated with forests. As such, the flow of fiber from these sites and in a detrimental manner is highly unlikely.

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Yes

(11.4.2) Comment

As a part of our certification programs, our procurement strategy involves ongoing use of the FSC National Risk Assessment (NRA) which identifies high conservation values (HCVs) in our sourcing region, including Critical Biodiversity Areas (CBAs). These include The Central and Southern Appalachian Key CBAs. Because these areas overlap with our sourcing areas, we partner with NGOs including the Forest Stewards Guild to advance conservation of key values in these large regions, which are not fully protected by federal or state management. Additionally, we have integrated into our sourcing practices measures to further protect these values before, during and after harvest activities.

[Fixed row]

(11.4.1) Provide details of your organization's activities in the reporting year located in or near to areas important for biodiversity.

Row 1

(11.4.1.2) Types of area important for biodiversity

Select all that apply

☒ Key Biodiversity Areas

(11.4.1.4) Country/area

Select from:

☒ United States of America

(11.4.1.5) Name of the area important for biodiversity

FSC National Risk Assessment Identifiers: - Native Longleaf Pine Ecosys - Late Successional Bottomland - Hardwoods KBAs: - Shugart/Felsenthal Natl Wildlife Refuge - Warren Prairie Natural Area - East Kiasatchie - Walter B. Jacobs Memorial Nature Park - Catahoula-Dewey Wills-Three Rivers - Fort Stewart Military Installation - Altamaha Waterfowl Mgmt Area - Okefenokee Natl Wildlife Refuge - Piedmont Natl Wildlife Refuge - Phinizy Swamp - Fort Jackson

(11.4.1.6) Proximity

Select from:

☒ Data not available

(11.4.1.8) Briefly describe your organization's activities in the reporting year located in or near to the selected area

Several biodiversity sensitive areas lie within the broader sourcing area where wood is harvested for supplying the company's four wood-based paperboard manufacturing facilities. The company has standing commitments not to source from these sites. Using the Forest Stewardship Council (FSC) National Risk Assessment (NRA), the company's supply basins overlap with two known ecosystems associated with High Conservation Values (HCVs): Native Longleaf Pine Systems and Late Successional Bottomland Hardwoods. The mapped regions where these ecosystems occur overlap with less than 25% of the company's wood fiber supply area. To address the risk of harvesting in a manner that may impact these ecosystems, the company implements a mitigation program, in partnership with the Forest Stewards Guild. Additionally, several Key Biodiversity Areas (KBAs) are located within the regions of Graphic Packaging's supply basins. Each of these sites has been reviewed for potential impacts. These sites are all under management by the US federal government, the state government or a county/parish in Arkansas, Georgia, South Carolina or Louisiana. All of these sites are managed with the objective of conservation and/or are under protection by law. Additionally, the triggering species for these sites is often, though not always, an aquatic bird species or not associated with forests. As such, the flow of fiber from these sites and in a detrimental manner is highly unlikely.

(11.4.1.9) Indicate whether any of your organization's activities located in or near to the selected area could negatively affect biodiversity

Select from:

☒ Yes, but mitigation measures have been implemented

(11.4.1.10) Mitigation measures implemented within the selected area

Select all that apply

☒ Scheduling

☒ Restoration

☒ Site selection

☒ Project design

☒ Abatement controls

☒ Operational controls

(11.4.1.11) Explain how your organization's activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

Several biodiversity sensitive areas lie within the broader sourcing area where wood is harvested for supplying the company's four wood-based paperboard manufacturing facilities. Because of the sourcing in this general region, harvesting could impact sensitive habitats. To address this risk, the company has implemented a multitiered approach: First, the company has standing commitments not to source from sites with high biodiversity value. Second, this requirement not to source from these sites is included in specifications to suppliers. Third, the company has a standing policy to only work with loggers trained on practices to protect biodiversity through use of Best Management Practices (BMPs). Each Key Biodiversity Area (KBA) located within the regions of Graphic Packaging's supply basins has been reviewed and assessed for likelihood of sourcing and potential impact. These sites are all under management by the US federal government, the state government or a county/parish in Arkansas, Georgia, South Carolina or Louisiana. All of these sites are managed with the objective of conservation and/or are under protection by law. Additionally, the triggering species for these sites is often, though not always, an aquatic bird species or not associated with forests. As such, the flow of fiber from these sites and in a detrimental manner is highly unlikely. Next, for ecosystems associated with High Conservation Values (HCVs) identified by the FSC National Risk Assessment (NRA) (Native Longleaf Pine Systems and Late Successional Bottomland Hardwoods), the company implements a mitigation program, in partnership with the Forest Stewards Guild. These efforts include restoration activities and targeted outreach and education to family landowners and smallholders, which provide a large portion of fiber furnish into the facilities. Lastly, we work closely with expert conservation partners to protect and promote biodiversity values in key areas. These include our longtime partnerships with the Black Bayou Conservation Initiative and the Georgia-Alabama Land Trust, which works to protect forest and woodlands against threats from development and other factors by using conservation easements, fee acquisitions, and partnership conservation agreements to protect lands in the supply basins in which Graphic Packaging sources wood.

[Add row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

(13.1.1) Other environmental information included in your CDP response is verified and/or assured by a third party

Select from:

☒ No, but we plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years

(13.1.2) Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party

Select from:

☒ Not an immediate strategic priority

(13.1.3) Explain why other environmental information included in your CDP response is not verified and/or assured by a third party

At this time we complete limited assurance on our energy, GHG emissions, and water data. As regulatory reporting regulations evolve, we will complete additional data assurance to comply with regulatory requirements.

[Fixed row]

(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

	Additional information
	No additional information.

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

EVP, General Counsel & Secretary

(13.3.2) Corresponding job category

Select from:

☒ General Counsel

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:

☒ No

