

# Human Rights Policy Statement under the German Supply Chain Act ("LkSG")



**Graphic  
Packaging**

INTERNATIONAL

## **I. PURPOSE**

This Policy Statement outlines Graphic Packaging’s commitment to protecting and promoting human rights across its global operations and supply chains. It serves to demonstrate compliance with the German Supply Chain Due Diligence Act (LkSG) and to embed responsible business conduct aligned with international human rights standards.

## **II. SCOPE**

This Policy Statement on the Human Rights Strategy is made pursuant to the German Supply Chain Due Diligence Act (“the Act”, “LkSG”) on behalf of Graphic Packaging Holding GmbH, a subsidiary of Graphic Packaging International, LLC (“Graphic Packaging”) and relates to paragraph 6 (2) requirements of the Act.

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

### **A. Our Operations**

Graphic Packaging International designs and produces consumer packaging, made primarily from renewable or recycled resources. As one of the world’s largest providers of paperboard consumer packaging, Graphic Packaging operates a global network of design and manufacturing facilities serving the world’s most widely recognized brands in food, beverage, foodservice, household, and other consumer products. Our products touch millions of people around the world every day. Our packaging keeps your breakfast cereal fresh and holds the hot tea or coffee that helps get you moving in the morning. It preserves the ready-to-cook evening meal that gives you more time with family and friends. Beyond the kitchen, it also holds and protects a host of beauty, healthcare, and household products that you use daily. Our solutions make every part of the day easier, safer, and more convenient.

An industry leader in innovation, the Company is committed to reducing the environmental footprint of consumer packaging. Our packaging starts with trees, a renewable resource. We design it to be recycled, and our innovative solutions continue to provide our customers and consumers with improved convenience and functionality. We work across the value chain to make it easier for people to recycle



our packaging – and, in doing so, we can play our part in the circular economy and support a more renewable future for generations to come.

## **B. Our Supply Chain**

We operate an integrated global supply chain that includes suppliers of raw materials, energy, freight carriers, warehousing, and other goods and services. We choose suppliers and other third-party partners who share our commitment to operate responsibly, including prohibiting the use of child labour and all forms of Modern Slavery. We recognize that actions across our supply chain can positively or negatively impact a wide range of stakeholders through social, environmental, and economic avenues.

Our VP, Supply Chain Sustainability drives efforts to engage suppliers, reduce value chain emissions, increase our purchases of renewable electricity, and enforce our human rights policies with our suppliers. In addition, we train global buyers annually on business ethics, anti-bribery awareness, preventing forced labour and child labour, export restrictions and other topics through our annual ethics training.

## **III. CORPORATE GOVERNANCE AND POLICIES**

### **A. Governance**

Graphic Packaging’s Board of Directors oversees the global compliance strategy and objectives, including the Company’s activities and related risks relevant to human rights. The Board of Directors reviews all significant policies and commitments and reviews the overall compliance program and corporate risk assessment annually.

Graphic Packaging has a Compliance & Risk Committee (“CRC”) comprised of a broad-reaching team of compliance experts who manage the adequacy and effectiveness of its compliance risk management. Members of the CRC include the EVP, General Counsel; EVP, Human Resources; SVP, Chief Information Technology; SVP, Chief Audit, Risk and Compliance Officer; the VP & Assistant General Counsel-Labour & Employment; VP & Assistant General Counsel; VP, Legal (EMEA), and the VP, HS&E. Members of the CRC and their teams work very closely with the VP, Chief Sustainability Officer, the VP Procurement, and the VP Supply Chain Sustainability on third-party risk management and to ensure that all relevant policies, training, and initiatives comprising the human rights program are implemented throughout Graphic Packaging’s supply chain to minimize the risk of forced labour and other human rights risks.

The VP, Chief Sustainability Officer leads the development and execution of the Company’s Environmental, Social & Governance (“ESG”) strategy and initiatives along with an interdisciplinary



team of experts that includes senior leaders in Procurement, Legal, and Human Resources. This team engages with other stakeholders to review critical ESG issues and enhance the Company’s sustainability efforts.

## B. Policies

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

In addition to the Code of Conduct, several global policies have been established codifying Graphic Packaging’s efforts to respect human rights within our Company or supply chain.

<p><b>Global Anti-Harassment and Anti-Discrimination Policy</b></p>	<p>We do not discriminate based on national or ethnic origin, place of residence, gender, gender identity, sexual orientation, pregnancy, color, religion, ancestry, age, disability, marital status, genetic information, political affiliation, veteran/military status, and any other status protected by applicable law. This applies to anyone we employ, as well as anyone who applies for employment with us.</p>
<p><b>Global Anti-Slavery and Human Trafficking Policy</b></p>	<p>We do not knowingly engage in forced, compulsory, or bonded labour, and we do not threaten workers or restrict their movement.</p>
<p><b>Global Child Labour &amp; Remediation Policy</b></p>	<p>We do not employ workers in violation of any applicable national or local regulation governing age of employment. In addition, we do not employ workers in violation of the mandatory school age set by a country. For more details, see our policy prohibiting child labour.</p>
<p><b>Global Health and Safety Policy</b></p>	<p>We are committed to providing a work environment that encourages and promotes wellness and safety for our employees, contractors, suppliers, visitors, and neighboring communities.</p>



<p><b>Global Human Rights Policy</b></p>	<p>The Company strives to be a role model in the packaging industry regarding safe and responsible business conduct, a good corporate citizen, and a partner to all our stakeholders. It is committed to supporting and enforcing human rights by prohibiting child and forced labour; increasing and supporting diversity, inclusion, and community and stakeholder engagement; respecting employees' freedom of association; and ensuring employees have a safe and health working environment.</p>
<p><b>Global Supplier Code of Conduct</b></p>	<p>We want to work with suppliers whose standards with respect to human rights align with our standards. Our goal is to eliminate human trafficking from our supply chain and to use only those products that do not finance or benefit armed groups in the Democratic Republic of Congo and nine adjoining countries.</p>
<p><b>Global Transparency in Supply Chains Act Declaration</b></p>	<p>The Company reports on our human rights practices annually through our ESG Report; U.K., Australia, and Canadian Modern Slavery Act Reports and Statements; California Transparency in Supply Chains Act Declaration; and Conflict Minerals Report.</p>
<p><b>Global Whistleblower Policy</b></p>	<p>All Graphic Packaging employees have an obligation to speak up and report conduct by a Company employee, supplier, visitor, or customer that they have a good faith belief violates a Company policy, including the Code of Conduct, or any law or regulation. The Company does not tolerate retaliation against employees who make a good faith report of such misconduct.</p>

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

The above-referenced policies are available at our Disclosures & Company Policies section on our website and hold each of us at Graphic Packaging and our suppliers accountable to: maintain work



environment that protects the human dignity of all; ensure all business and working relationships are never exploitive or corrupt; and provide the means to deal with situations in conflict with our policies. Graphic Packaging continually reviews and updates its policies in consultation with in-house and external experts.

#### **IV. DUE DILIGENCES UNDER THE ACT (“LkSG”)**

##### **1. Risk Management System**

Graphic Packaging has implemented a group-wide risk management process to prevent or minimize human rights and environmental risks in its own business area and at suppliers. To ensure consistency, Graphic Packaging has formed a LkSG working group and issued a uniform LkSG guideline that outlines the responsibilities, procedures, and governance for implementing these obligations. The working group consists of a Human Rights Officer and representatives from respective functional areas (e.g. Supply Chain, Sustainability, Legal, Health & Safety, Compliance, etc.) and affected Graphic Packaging production sites.

The Human Rights Officer is responsible for conceptualizing and implementing the due diligence obligations of the LkSG. The working group is coordinated by the Human Rights Officer and is responsible for the project implementation. The group ensures that all due diligence requirements under the Act are performed in a timely manner and documented. At least yearly, the Human Rights Officer reports to the Management of GPI Holding GmbH on progress, findings and corresponding measures. The Risk Management System is being reviewed and monitored in a multistage process to ensure full effectiveness and will be adapted in case of changing conditions.

##### **2. Risk Assessment**

At Graphic Packaging, risk assessment and management are an integral part of our strategic planning, and governance approach. Risks are assessed annually and event based, to identify human rights and environmental risks within Graphic Packaging’s own business area and with suppliers. Each company under Graphic Packaging Holding GmbH that is subject to reporting requirements under LkSG is included in the risk assessment. The results of the assessment are consolidated, documented and stored for at least 7 years.

Graphic Packaging identifies and assesses risks within its own business operations by utilizing the results of external audits conducted at all in-scope locations. These locations regularly undergo SEDEX SMETA audits, which assess labor standards, occupational health and safety, environmental management, and business ethics.



To assess its direct suppliers, Graphic Packaging applies a risk-based approach. An initial abstract risk assessment is conducted using external databases to classify suppliers by country- and industry-specific risk levels. Based on these results, suppliers are prioritized for further review, taking into account risk likelihood and Graphic Packaging's leverage. Where elevated risks are identified, a concrete risk assessment is performed, supported by desktop studies and supplier self-assessment questionnaires. Further, direct suppliers are screened through the Dow Jones database as part of the company's Third-Party Risk Management process.

For our own operations and direct suppliers, all identified risks are evaluated based on their severity and probability of occurrence. This assessment results in the creation of a risk ranking and a corresponding graphical representation to support transparency and decision-making. All risks identified are systematically documented in a centralized risk inventory. Findings of the risk assessments are reported to the Management of GPI Holding GmbH and all members of the LkSG working group. Based on these findings, appropriate objectives, preventive and remedial measures are defined.

The following priority risks have been identified in the risk assessment:

Within our own operations:

- Occupational health & safety

Within our Supply Chain:

- Destruction of vital natural resources; in particular the use of large quantities of water

### **3. Preventive Measures**

#### **a. Preventive Measures for our own operations**

The human rights strategy is implemented in all business areas at Graphic Packaging. For our own operations, we have implemented the following measures to ensure high standards and compliance:

Policies and Guidelines: Graphic Packaging has created and published guidelines and policies, like the Human Rights Policy, Code of Business Conduct & Ethics or Global Supplier Code of Conduct. These documents define our global minimum expectations in the areas of business integrity, anti-corruption, human rights, labour practices, health and safety, and environmental stewardship and provide guidance on maintaining ethical business practices and complying with national and local laws and regulatory requirements. The policies are available at the Disclosures and Company Policies section on Graphic Packaging International's website.

Social Responsibility Assessments: Graphic Packaging conducts a tiered system of due diligence activities to identify risks and prevent human rights impacts across our global business operations. We



use the Supplier Ethical Data Exchange (SEDEX) platform, an online collaborative platform that allows us to conduct periodic, online self-assessments and, every three years, to complete a social responsibility SEDEX Member Ethical Trade Audit (SMETA) to ensure compliance with applicable local, state, or national/regional requirements, as well as Graphic Packaging policies. It is of immense importance to us to address any non-conformances in a quick and effective manner.

Raising Awareness & Training: Graphic Packaging recognizes that the management of human rights risks requires continuous capability building and raising awareness of teams across the company. We use technology to advance the learner's experience. Employees complete annual Code training through Graphic Packaging University, which reminds them of our core values, policies prohibiting discrimination and harassment, and commitment to acting ethically and with integrity. We conduct in-person training for our hourly workforce at our facilities and maintain training records locally. Employees receive additional ethics training, based on job profile, to provide comprehensive knowledge on potential risks related to individual job responsibilities (e.g. anti-harassment, anti-slavery/human trafficking awareness, human rights).

Risk-specific measures: In case we have identified an existing risk at a business unit/function, additional preventive measures are defined and taken. This may include conducting additional audits to closely monitor compliance with the Code of Conduct, providing specific capacity-building training on the identified risk, and implementing individual case-specific preventive measures based on the specific risk situation to further bolster our due diligence processes.

#### **b. Preventive Measures for our Supply Chain**

To prevent the potential of human rights and environmental related risks within the global Supply Chain, Graphic Packaging has implemented numerous measures:

Supplier Management: Supplier engagement, supplier audits, and supplier risk assessments are incorporated into our practices to minimize our risk.

Procurement strategy & Supplier Contracting: Our procurement team considers both environmental and social impacts in its purchasing decisions and is committed to increasing diversity within our supplier base. We endeavor to prevent human rights and environmental risks when drafting and performing contracts, for example regarding pricing, delivery times, short-term changes to products or services as well as the termination of business relationships.

Supply chain transparency: We strive to increase supply chain transparency with regard to certain defined risk commodities and countries, which are monitored closely, reviewed and updated regularly.

Global Supplier Code of Conduct: Our Global Supplier Code of Conduct defines our expectations for supplier compliance with applicable laws and regulations, as well as adherence to internationally



recognized ESG frameworks and standards. The frameworks and standards provide guidelines for ethical business practices, labour, and human rights practices; environmental stewardship; the handling of confidential information; the protection of data privacy; and compliance with conflict minerals laws and certifications.

Raising Awareness & Training: Employees responsible for procuring goods and services receive training each year on business ethics, antibribery awareness, preventing human and environmental rights risks, export restrictions and other topics through our annual ethics training. Additional specialized training is provided to targeted supply chain employees based on their roles.

Risk-specific measures: In case risks are categorized as medium or high risk, additionally case-specific measures are taken. Suppliers are asked to complete self-assessment questionnaires or audits are carried out on the specific risks identified. The results of an audit are made available to the suppliers and discussed and, if necessary, a corresponding action plan is developed and agreed to improve the supplier's risk situation. Additionally, suppliers with a high-risk score receive training on the respective risk.

#### **4. Remedial Measures**

An important part of the risk management framework at Graphic Packaging is the procedure for addressing violations. If we discover that a violation of a human rights-related or environmental obligation has already occurred or is imminent in our own business area or at a supplier, we take appropriate remedial action(s) without undue delay. The measures are taken on a case-by-case basis, based on the nature of the violation. Remedial actions serve to prevent, stop, or minimize the extent of the violation. The focus of remedial action is always on the person whose rights have been violated. Besides that, a focus is put on changing the behavior of the person or entity that caused the violation with the aim of preventing further incidents.

In the event of a violation within our own business area, the responsible business function/unit is informed and will further investigate the incident, if necessary. Once a violation has been confirmed, the responsible business function/unit decides on the corrective measures to be taken, involving the responsible teams assigned to the respective risk category. Depending on the violation, potential remedial actions include: exchange with other departments regarding learnings/structural issues; implementation of specific remedial actions, such as communication and training initiatives; disciplinary measures like warning letters or the termination of the employment contract of the person responsible for the violation. After taking remedial action, the responsible business function/unit together with the Internal Audit team assess the effectiveness of the remedial actions. If the remedial action was assessed as ineffective, the remedial process must be re-performed, and effective corrective actions must be taken.



In the event of a violation at direct suppliers, the responsible function/unit and the Procurement team are informed. Remedial actions are then implemented based on reasonable efforts. Procurement strives to agree with the respective supplier on appropriate actions. However, if a violation cannot be terminated in a reasonable timeframe (within approx. 4 weeks), the parties involved agree on a concept for ending or minimizing the violation, including concrete action items, a concrete time schedule and potential sanctions for non-compliance (“Action Plan”). Internal Audit assesses the effectiveness of the remedial actions. If the remedial actions were assessed as ineffective, the remedial process must be re-performed, and effective corrective actions must be taken. If the cause of ineffectiveness is the supplier's unwillingness to cooperate, sanctions may have to be taken. The use of termination rights is considered as an “ultima ratio” in the case of very serious violations if the Action Plan has not led to significant improvements and no milder means are available.

## **5. Indirect Suppliers**

We acknowledge that our supply chain activities can have both positive and negative effects on a broad spectrum of stakeholders. Therefore, our global teams are committed to promoting supply chain transparency and upholding our standards throughout all tiers of the supply chain, including beyond our direct suppliers. If we have factual indications (e.g. media reports, reports from NGOs, complaints within submitted via the complaints procedure, etc.) that a violation of a human rights-related or environmental obligation at indirect suppliers appears possible (substantiated knowledge), a risk analysis is conducted. For this purpose, the affected indirect supplier is integrated into the risk analysis by procurement - analogous to the process for direct suppliers. For this purpose, the direct supplier and other intermediate suppliers are included to enable appropriate influence. Should this analysis lead to a risk, or violation being confirmed, procurement takes respective preventive and remedial measures analogous to the process for remediation at direct suppliers.

## **6. Reporting Mechanisms**

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

Employees are informed about the Alertline through postings in our facilities, the Code of Conduct, Global Whistleblower Policy, the Company Intranet, and other policies. They also receive information



about filing complaints via the Alertline during annual compliance training and occasional notices. Suppliers are notified about the availability of the Alertline via the Company's public website and the Global Supplier Code of Conduct. Employees who fail to report a violation of the Company's policies, including but not limited to the prohibition against forced labour, human trafficking, and child labour, are subject to discipline, up to and including termination.

Complaints can be submitted 24 hours a day, seven days a week, in text form or as a voice message in the respective language of the whistleblower, openly or anonymously. Complaints submitted via these reporting channels are sent directly to the Chief Compliance Officer, General Counsel, and Chief Labour and Employment Counsel. The impartiality, independence and freedom from instructions of persons entrusted with the processing of complaints is ensured. Further details on our complaint's procedure and the handling of incoming reports can be found in our rules of procedure under German Supply Chain Complaints Procedures.

In addition, employees can report information to

- Representatives from the local HR department,
- HR business partners from the region or business division, or other members of the HR department in the country or region,
- the Executive Vice President for Human Resources at [EVP-HumanResources@graphicpkg.com](mailto:EVP-HumanResources@graphicpkg.com)
- the Compliance Officer or Head of Internal Audit, at [GRAPHICPACKAGING\\_Internal\\_Audit\\_Alertline@graphicpkg.com](mailto:GRAPHICPACKAGING_Internal_Audit_Alertline@graphicpkg.com)

The confidentiality of a whistleblower's identity is always maintained. Appropriate measures are taken in case of violations. We do not tolerate any retaliatory measures against whistleblowers or other negative consequences.

## **7. Documentation and Reporting**

Compliance with all due diligence obligations is documented internally on an ongoing basis and stored in an audit-proof manner for at least seven years. Each due diligence measure is recorded in the documentation.

An annual report on compliance with the above-mentioned due diligence obligations is submitted to the Federal Office of Economics and Export Control (BAFA) as the competent supervisory authority via an electronic mask and published on our homepage for a period of seven years.



## **V. EXPECTATIONS TOWARDS EMPLOYEES AND SUPPLIERS**

Graphic Packaging requires its employees and suppliers to respect human and environmental rights and to support us in addressing risks and preventing, reducing or ending violations. We expect our employees and contractors to comply with our company policies and requirements as listed in our Code of Conduct and to work in a safe and environmentally responsible manner 100% of the time. Our suppliers are expected to use their best efforts to implement the requirements outlined in our Global Supplier Code of Conduct with their employees, with their suppliers and subcontractors throughout their own supply chain.

In general, all suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with Graphic Packaging International entities worldwide are expected to follow this Supplier Code and all relevant local laws, regulations, rules, and the specific services provided by Suppliers to Graphic Packaging International.



## VI. LOOKING AHEAD

Our goal is to Be Better, Every Day. We will do this by continuing to update our policies and procedures to comply with applicable ethical and legal requirements pertaining our operations and supply chain. In addition, the Company is expanding our 2025 compliance training to provide anti-discrimination and harassment training to hourly employees outside the United States and to provide additional information about sustainability, human rights and general social responsibility to all employees. We also plan to increase our scrutiny and assessment of suppliers in our supply chain across the globe to ensure that they comply with our Core Values of Integrity, Respect, Accountability, Teamwork, and Relationships.

Graphic Packaging will ensure that the due diligence obligations arising from LkSG are complied with and continually adapted to developments in the human rights situation.

This policy is continually being developed and completed. It is approved by the Board of Directors of Graphic Packaging Holding GmbH.



### **Innovation**

Build the leading sustainability-focused consumer packaging innovation platform



### **Culture**

Enable a safe, engaged, customer-focused culture



### **Planet**

Steadily and measurably improve the environmental footprint of consumer packaging



### **Results**

Consistently execute for customers, shareholders and all stakeholders

