

**GRAPHIC PACKAGING INTERNATIONAL**  
**MODERN SLAVERY REPORT FOR FISCAL**  
**YEAR 2025**



**Graphic  
Packaging**  
INTERNATIONAL

## I. OVERVIEW

This Modern Slavery Report describes Graphic Packaging International, LLC' and its subsidiaries (collectively "Graphic Packaging") actions during the 2025 fiscal year (January 1-December 31) regarding modern slavery and child labour in our business and supply chains.

This report is published pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Canadian Act"), the United Kingdom Modern Slavery Act 2015 (the "UK Act"), and the Australian Modern Slavery Act 2018 (Cth) (the "Australian Act").

The entities listed below have been determined to fall within the scope of the listed local modern slavery and human rights legislation:

Graphic Packaging International Australia Converting Ltd ABN 56 107 485 898

Graphic Packaging International Bardon Limited

Graphic Packaging International Canada, ULC<sup>1</sup>;

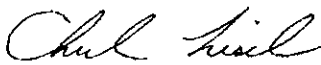
Graphic Packaging International Europe UK Limited

Graphic Packaging International Gateshead Limited

Graphic Packaging International Limited

This report was produced in consultation with our subsidiaries to identify and assess modern slavery risks that may exist. This report for the entities listed above was approved on May 29, 2026 by the members of Graphic Packaging's executive leadership team whose signatures appears below and in Graphic Packaging's capacity as the principal governing body for 2025. Additionally, the required board approvals for Australia and the United Kingdom were formally completed and duly recorded.

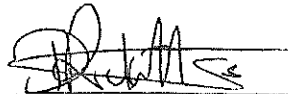
The representatives below have the authority to bind the Graphic Packaging entities listed above. In accordance with the requirements of Section 11 of the Canadian Act, we attest that we have reviewed the information contained in the report for the entities listed above. Based upon our knowledge, having exercised reasonable due diligence, we attest that the information in the report is true, accurate, and complete in all material respects, to the best of our knowledge, information and belief for the purposes of the Canadian Act, for the reporting year listed above.



Charles D. Lischer  
Senior Vice President, Chief Accounting Officer  
Interim Chief Financial Officer



Jean-Francois Roche, Director of:  
Graphic Packaging International Bardon Limited  
Graphic Packaging International Europe UK Limited  
Graphic Packaging International Gateshead Limited  
Graphic Packaging International Limited



David Ricketts, Director of:  
Graphic Packaging International Australia and  
Converting Ltd

<sup>1</sup> Graphic Packaging International Canada, ULC has facilities and operations in the Canadian provinces of Manitoba, Ontario, and Quebec.

## **II. GRAPHIC PACKAGING OPERATIONS AND SUPPLY CHAIN**

### **A. Our Operations**

Graphic Packaging is one of the largest manufacturers of paperboard and paper-based packaging for some of the world's most recognized brands of food, beverage, foodservice, and other consumer products. The company operates on a global basis, and our history extends more than 100 years, as numerous legacy companies have joined forces to create an ever-evolving corporation. We have over 100 locations in 20 countries around the world, and each of them are committed to providing consumer packaging that makes a world of difference. With a product portfolio that emphasizes renewable, recycled, and recyclable materials, we are as committed to our customers and 23,000+ employees as we are to protecting the environment and giving back to the communities where we live and work. Our 2025 net sales were \$8.6 billion USD.

Graphic Packaging International operates as a global corporate group with the ultimate parent company holding controlling ownership interests in a network of direct and indirect subsidiaries across multiple jurisdictions supporting manufacturing, commercial and shared service activities. The parent company establishes the group's governance framework, including enterprise-wide policies, risk management standards, and oversight mechanisms. This includes policies and controls relating to human rights and the prevention of modern slavery and human trafficking.

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

### **B. Our Supply Chain**

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

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

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

Our five North American paperboard mills produce unbleached paperboard, bleached paperboard and recycled paperboard. We then convert the paperboard into our packaging solutions. We also sell paperboard to a wide variety of independent paperboard packaging manufacturers and brokers.

Our European packaging facilities consume paperboard supplied from our own paperboard manufacturing facilities in North America and convert other paperboard grades purchased from external suppliers mainly in the United Kingdom and continental Europe. In addition to paperboard, Graphic Packaging works with long-term suppliers for sourcing other key raw material

commodities such as printing inks, overprint varnishes, decorative materials, and packaging materials. We believe that these strong supplier relationships are the key to ensuring continuous improvement in supply chain working conditions.

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

#### **A. Governance**

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

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

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

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

#### **B. Policies**

Our Code of Conduct is the cornerstone of our compliance and Human Rights Program and sets forth Graphic Packaging's commitment to ensuring people are treated fairly and with respect — across our Company, throughout our supply chain, and within the communities where we operate. The Code of Conduct is available in 16 different languages that correspond to the languages spoken by the employees in our operations and supply chain. Our Code outlines the Company's beliefs pertaining to protecting human rights; equality among people; employee well-being and security; personal freedom from persecution; privacy; and economic, social, and cultural freedom. We aim to ensure all employees can feel emotionally safe at work and be their authentic and best self. A working environment lacking psychological safety can foster distractions that lead to missteps and

disengagement. Our policies and programs seek to create a workplace that protects the emotional, psychological, physical, and financial aspects of employee well-being, and fosters a spirit of respect, trust, accountability, and teamwork. We expect our suppliers and business partners to do the same.

Our Code of Conduct, Human Rights Policy, and Global Supplier Code of Conduct (GSCOC) encompass the international human rights principles set forth in the UN Guiding Principles on Business and Human Rights; the UN Universal Declaration of Human Rights and its two corresponding covenants — collectively known as the International Bill of Rights; the UN Conventions on the Rights of the Child; and the UN Convention on the Elimination of Discrimination against Women. Our policies also align with select targets set forth in the UN Sustainable Development Goals. Graphic Packaging’s approach is further informed by the OECD Guidelines for Multinational Enterprises, the ILO’s 1998 Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact (UNGC). To ensure compliance with our Code of Conduct, Core Values, and ethical practices, all employees are trained on the Code of Conduct annually.

In addition to the Code of Conduct (Revised 2024), Human Rights Policy (Revised 2025), and CSCOC (Revised 2024), several global policies have been established codifying Graphic Packaging’s efforts to ensure no modern slavery exists within our Company or supply chain. Such policies include the following: Global Anti-Harassment and Anti-Discrimination Policy, Revised 2026; Global Transparency in Supply Chains Act Statement on Human Trafficking and Anti-Slavery, Revised 2025; Global Child Labour & Remediation Policy, Revised 2023; Global Whistleblower Policy, Revised 2026; and our Global Health and Safety Policy, Revised 2023. We review and analyze these policies every one to three years.

The above-referenced policies are available at our Disclosures & Company Policies section on our website and hold each of us at Graphic Packaging and our suppliers accountable to: maintain work environments that protect the human dignity of all; ensure all business and working relationships are never exploitive or corrupt; and provide the means to deal with situations in conflict with our policies. Graphic Packaging continually reviews and updates its policies in consultation with in-house and external experts.

### C. Human Rights Practices

<b>Health and safety</b>	We are committed to providing a work environment that encourages and promotes wellness and safety for our employees, contractors, suppliers, visitors, and neighboring communities.
<b>Equal opportunity and fair treatment</b>	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.
<b>Respectful behavior</b>	We do not tolerate conduct that would lead to a hostile, intimidating, or offensive work environment. For more details, see our anti-harassment and anti-discrimination policy.
<b>Fair and safe working environment</b>	We respect our employees’ right to work free from persecution and abusive or otherwise unfair treatment. We are committed to providing a work environment free from violence, threats of violence, harassment, and physical intimidation or coercion.

	We implement security safeguards, as necessary, to protect our employees, contractors, and visitors to our facilities.
<b>Wages</b>	We comply with applicable national, provincial, and local regulations related to wages, work hours, overtime, and benefits. We also are committed to paying employees in a fair and equitable manner for the work they perform.
<b>Workers' rights</b>	We recognize and respect employees' right to choose whether to join a labour union, participate privately in trade associations, and collectively bargain in accordance with local or national law.
<b>Voluntary labour</b>	We do not knowingly engage in forced, compulsory, or bonded labour, and we do not threaten workers or restrict their movement.
<b>Child labour</b>	We do not employ workers in violation of any applicable national, provincial, or local regulations governing age of employment. In addition, we do not employ workers in violation of the mandatory school age set by any country.
<b>Privacy</b>	We respect the privacy of personally identifiable and other information of our employees, customers, suppliers, and business associates. We are committed to proper handling of this information in accordance with our privacy policies, contractual obligations, and all applicable privacy laws.
<b>Suppliers</b>	We seek to work with suppliers whose standards with respect to human rights align with our own. Our goal is to eliminate human trafficking from our supply chain and to use only those products that do not finance or benefit armed groups in the Democratic Republic of Congo and nine adjoining countries. The Company's expectations for suppliers are fully set forth in our GSCOC.
<b>Transparency</b>	We report our human rights practices annually through our Modern Slavery Report, Global Transparency in Supply Chains Act Statement on Human Trafficking and Anti-Slavery, Conflict Minerals Report, and our annual Impact Report.

## **IV. ASSESSING AND MANAGING THE RISK**

### **A. In Our Operations**

Most Graphic Packaging employees are employed directly by the Company and their terms and conditions of employment are governed by local, provincial, or national laws. However, we respect the rights of employees to determine whether they will be represented by a collective bargaining representative and believe that employees should exercise those rights in an informed manner based upon the free exchange of information. In 2025, approximately 59% of Graphic Packaging global employees were covered by collective bargaining agreements with labor unions or works councils that contained their terms and conditions of employment. In addition, the Company's legal and human resources experts ensure that all employment policies and practices are updated regularly in compliance with applicable laws and regulations, and they are made available to our employees in languages appropriate to our workforce.. Contingent workers are engaged via reputable agencies with whom we have contractual agreements that provide us with the right to audit certain employment practices to ensure legal compliance.

Graphic Packaging regularly reviews and updates its Child Labour and Remediation Policy, most recently in 2023. The Company prohibits the employment of anyone under the age of 15, and individuals ages 15 to 17 are prohibited from working in positions that would expose them to hazardous work or materials or that interfere with their education, require excessive hours, or involve night work. We require legal proof of age at time of hire and maintain copies of these documents in our local HR management systems. Original employee documents are returned to employees. Graphic Packaging supports all forms of legal youth employment, including the development of legitimate workplace apprenticeships and internship programs for youth. We have controls in place, and, to our knowledge, no Graphic Packaging operations face significant risks of child labour.

The Company complies with local, provincial, national, and regional laws prohibiting all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery, and any form of human trafficking. We do not collect and retain employees' legal personal identification documents, withhold wages, allow debt bondage practices, nor do we attempt to control or restrict employee movements.

When evaluating a potential target for acquisition, Graphic Packaging engages in a vigorous due diligence process that includes an assessment of human rights risks. The human rights assessment includes a review of relevant policies, analysis of major supply chain agreements and relationships, and assessment of immigration and employment verification processes. Following acquisition, employees are screened to ensure they are legally permitted to work and onboarded into Graphic Packaging as soon as possible. Newly onboarded employees are also immediately provided with copies of our Code of Conduct and access to our global Alertline for filing grievances and complaints.

We measure the effectiveness of our human rights approach by assessing the findings and progressive scope of matters reported through our Alertline process, social responsibility risk screening and auditing program, and annual compliance training completion rates.

## 1. The Alertline Process

Employees, suppliers, and customers may contact a local or regional HR representative; our legal, internal audit or compliance departments; or our confidential, 24-hour Alertline to ask questions about our human rights policy or report concerns or walk-ins. The Alertline is maintained by a third-party provider, and complaints may be made online or via country-specific toll-free telephone numbers. Complaints or inquiries are assigned to trained members of the Company's Employee Relations, Internal Audit, Legal or Human Resources teams for investigation. Investigations must be completed in no more than 30 days, depending on severity. All stakeholders are informed about the outcome of the investigations and any related corrective actions. The German Human Rights Officer is informed of complaints and will be involved where necessary, particularly in cases involving potential or actual human rights risks.

The Company does not tolerate retaliation for reporting a complaint on the Alertline, and anonymous reports are welcome.

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

In 2025, there were no Alertline reports of child labor or forced or compulsory labor or other risks of human trafficking in our operations.

## 2. Risk Screening Assessment and Social Responsibility Audits

Graphic Packaging conducts a tiered system of due diligence activities to identify risks and prevent human rights impacts across our global business operations. We use the Supplier Ethical Data Exchange (Sedex) platform, an online collaborative platform that enables us to conduct periodic, online self-assessments and, every three years, to complete a social responsibility Sedex Member Ethical Trade Audit (SMETA) to ensure compliance with applicable local, state, or national/regional requirements, as well as Graphic Packaging policies. As we acquire new facilities, we add them to the program and work to complete the SMETA within the first two years after purchase. All audits are conducted by a Sedex approved, independent third-party auditor.

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

The 2025 risk assessment, conducted across 27 countries where Graphic Packaging has significant business operations, identified Indonesia, Nigeria, and China as potentially high-risk countries for labour practices consistent with prior year assessments. Current operations in those flagged countries include two packaging plants in our social responsibility auditing program for ongoing monitoring. The office location in China employs approximately eight salaried employees who

complete annual business ethics training. To our knowledge, no significant human rights risks are present in these locations.

During 2025, third party auditors conducted SMETA social responsibility audits at a number of our converting facilities and, for the first time, two of our paperboard mills. Findings at multiple North American locations commended the excellent benefit packages offered to employees, including paid holidays and vacations, tuition reimbursement, and adoption assistance. Nine international sites were also commended for best practices regarding wages and benefits, our free employee assistance program, fitness programs, and childcare support.

Opportunities for improvement identified during the 2025 SMETA audits include a need to enhance the vetting process for recruitment and temporary agencies and to ensure compliance with our CSCOC requirements. This includes ensuring agencies are compliant with legislation and have adequate systems in place for E-Verify/I-9 compliance and records. Other identified opportunities for improvement include the need for a global living wage analysis and to continue improving health and safety processes. There were no identified risks of forced or compulsory labor or child labor in the 2025 SMETA audits.

### 3. Training and Awareness

Graphic Packaging recognizes that the management of human rights risks, including Modern Slavery, requires continuous capability building awareness campaigns for teams across the Company. We use technology to advance the learner experience. We offer compliance training initiatives, hourly technical training, and leadership development components. In 2025, 96% of Graphic Packaging's global salaried employees completed Code of Conduct training, reminding them to act with integrity, respect one another's differences, and prevent discrimination and harassment. Approximately 97% of salaried employees completed Modern Slavery training in 2025, which included education on identifying the early signs of human rights abuses in our business and supply chain. In addition, the Company celebrated its first global Compliance Week in 2025 with a series educational posts and games that encouraged employees to speak up about unethical conduct and policy violations.

#### **B. In Our Supply Chain**

Graphic Packaging recognizes we cannot act alone to advance human rights. We want to work with suppliers whose standards with respect to human rights, inclusion, labour practices, safety, and freedom of association align with ours. We set expectations for our suppliers to respect and comply with international human rights standards and to set similar expectations with their supply chain partners through our GSCOC, which explicitly prohibits the use of child labor and forced or compulsory labor in our supply chain. The GSCOC is available via our public website, embedded in our terms and conditions, and incorporated into our supply agreements. We expect our suppliers to have processes in place to prevent, mitigate, and remediate human rights violations they may cause or to which they may contribute.

We use a supplier due diligence and alert monitoring process to vet and monitor our suppliers for forced or compulsory labour risks and adverse media concerns. In 2025, our due diligence and alert monitoring system identified six potential forced labor incidents and one potential human trafficking incident in our supply chain. Each alert was thoroughly reviewed to validate the underlying facts and assessed to determine whether appropriate mitigation actions had been implemented following the incident. Relevant stakeholders were engaged to provide statements and supporting documentation. All findings were reviewed by our Third-Party Risk Management (TPRM) subcommittee. In each case, sufficient evidence of mitigation was provided, allowing the associated risk to be downgraded and business operations to continue.

If a supplier is unable or unwilling to remediate an incident of child or forced/compulsory labor, the TPRM subcommittee considers alternative actions to elevate and resolve the situation, which may include termination of the business relationship.

We also establish connections with selected key suppliers on the Sedex platform where they are already registered. This provides us with additional visibility, such as access to their Self-Assessment Questionnaires (SAQs) and available audit information, including aspects related to labour standards, human rights, and the prevention of forced labour. The information shared on Sedex is structured around its four pillars, as described above, which helps provide a broad, high-level view of potential risks within the supply chain while supporting general transparency.

## **V. OUTLOOK**

Graphic Packaging is dedicated to improving our initiatives pertaining to the eradication of modern slavery and upholding human rights in our operations across the globe. This dedication is reflected in our increased usage of the Sedex platform, the implementation and use of other risk assessments, and the expansion of our speak up and awareness programs for employees. We continue to update our policies and procedures to comply with applicable ethical and legal requirements pertaining to our operations and supply chain, and we are steadily increasing our scrutiny and assessment of suppliers to ensure that they comply with our Core Values of Integrity, Respect, Accountability, Teamwork, and Relationships.