

April 2026

Public Policy Position Statement



Forward-Looking Statement

Graphic Packaging Holding Company, the parent company of Graphic Packaging International, LLC (“Graphic Packaging” or the “Company”), is incorporated in the state of Delaware and publicly traded on the New York Stock Exchange under ticker symbol GPK.

The public policy positions, perspectives, and expectations expressed herein reflect the views of Graphic Packaging as of the date of publication and are provided for informational purposes only. The policy perspectives presented in this document are the Company’s own and do not necessarily represent the views of any industry association, governmental body, or third-party organization with which Graphic Packaging may be affiliated or engaged. Nothing in this document is intended to create legal rights, obligations, or binding commitments on the part of the Company.

This Position Statement provides retrospective information for calendar year 2025. Past support of a candidate or an organization cannot be assumed to mean that the Company and/or its Employee Political Action Committee (PAC) are providing similar support today. The Company and its Employee PAC reserve the right to discontinue support of any recipient and may have discontinued giving to some recipients listed in this Position Statement.

This Position Statement may contain forward-looking statements within the meaning of Section 27A of the Securities Act of 1933 and Section 21E of the Securities Exchange Act of 1934, which involve risks and uncertainties. Forward-looking statements provide current expectations of future events based on certain assumptions and include any statement that does not directly relate to a historical or current fact. The words “aim,” “strive,” “believe,” “expect,” “will,” “will be,” “will continue,” “will likely result,” “anticipate,” “plan,” “strategy,” “estimate,” “target,” “goal,” “outlook,” “seek,” “project,” “should,” “would,” and similar expressions and variations or negatives of these words or phrases, generally identify “forward-looking statements,” which speak only as of the date such statements were made.

Forward-looking 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, 2025 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.

Graphic Packaging International Public Policy Position Statement

Updated April 2026

Government policy is one of the most significant external forces shaping Graphic Packaging International's (Graphic Packaging's) operations, competitiveness, and long-term success. New laws and changes to existing laws can fundamentally affect the markets in which we operate and how we do business. Evolving laws and regulations can also influence our financial performance and, in turn, our employees, retirees, suppliers, customers, communities, and stockholders.

Graphic Packaging recognizes that legislative and regulatory frameworks vary by region, and these regional perspectives are an important consideration in shaping our government policy strategy. Given the scale of our operations and regulatory exposure, the United States (U.S.) represents our most significant public policy environment. Accordingly, we engage — where legally permitted — in advocacy efforts and make political contributions to candidates and organizations whose policy positions align with our business priorities and values, and where such engagement supports informed policymaking. All political activity is conducted in compliance with applicable laws and regulations and is subject to internal governance, oversight, and transparency requirements. In addition, Graphic Packaging employees in the U.S. may participate in policymaking and political processes by contacting their local and state legislators through our Company grassroots campaigns, and by contributing to the Graphic Packaging International Political Action Committee (Graphic Packaging-PAC). Graphic Packaging supports these activities as part of our commitment to open, transparent, and responsible civic engagement.

In 2025, our advocacy centered on international trade, extended producer responsibility (EPR) implementation costs, and the advancement of pragmatic environmental regulation. In trade, the European Union (EU) postponed EU Deforestation Regulation (EUDR) enforcement to December 30, 2026, while U.S. authorities recognized it as a non-tariff barrier, even as pulp and paper largely avoided new tariffs and United States-Mexico-Canada Agreement (USMCA) continued duty-free flows. On EPR, early fee schedules in Oregon and Colorado confirmed material cost exposure for fiber-based packaging, underscoring our push for performance-based fee modulation and clarity on recyclability labeling in California. Regarding air quality and particulate matter (PM) environmental regulations, the U.S. Environmental Protection Agency (EPA) moved to vacate the 2024 PM_{2.5} standard and began a new review more aligned with cost-consideration and scientific evidence, and the Good Neighbor Plan remained stayed as U.S. EPA initiated reconsideration. We also advanced recognition of mill biomass in federal clean-power credits while opposing policies that could distort fiber markets, and we challenged per- and polyfluoroalkyl substances (PFAS) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) designations poised to expand pass-through liabilities — all consistent with our commitment to science-based, proportional policy that protects circularity and competitiveness.

Advocacy priorities in Europe included direct outreach to policy makers in the EU and United Kingdom of Great Britain and Northern Ireland (U.K.) and supporting several industry association efforts (e.g., Fibre Packaging Europe, European Carton Makers Association (ECMA), and 4evergreen) to advocate for the industry's position with respect to packaging waste regulations. We shared with officials the role paperboard packaging plays in supporting a circular economy and the importance of fair EPR fees. Our experts also supported relevant bodies responsible for secondary regulations linked to the EU Packaging and Packaging Waste Regulation (PPWR), such as the EU Joint Research

Centre, the European Committee for Standardization (CEN), and others. We believe the positive impact of paperboard packaging circularity should be recognized in new regulations and when developing criteria for assessing packaging recyclability and optimizing its labelling.

We engage with public officials through several channels, including industry associations, professional lobbyists, grassroots advocacy, and political contributions. All employees and third parties who engage in political activities on our behalf are required to comply with applicable U.S. and international laws, as well as our Code of Conduct. We act with integrity and take our role in the political process seriously, recognizing its direct impact on our ability to compete effectively in today's marketplace.

Policy Focus Area	Graphic Packaging Position
Carbon neutrality of biomass	<p>Energy generated from biomass residuals is integral to our manufacturing operations and is the primary source of energy at our wood-based paperboard manufacturing facilities. We support policies that recognize sustainably-sourced biomass as a renewable energy source and appropriately acknowledge its role in a carbon neutral energy cycle.</p> <p>Biomass residuals are a byproduct of the forest products value chain and an essential component of sustainable forest management, in which all parts of the tree – from stump to top – are responsibly used. We believe sustainable forest management is a critical tool for mitigating climate change through ongoing carbon sequestration in forests and long-lived wood-based products, while enabling the efficient use of renewable resources.</p>
Combating illegal logging	<p>We are an advocate for global efforts to eliminate illegal logging and protect forest ecosystems. We support the forest sustainability provisions included in the USMCA. We also support the intent of the EUDR and its continued simplification, ensuring its implementation is risk-based, proportionate, and avoids unnecessary administrative burdens for responsibly-managed, low-risk supply chains. Together, these measures strengthen responsible sourcing practices and reinforce our commitment to sustainable, deforestation-free supply chains.</p>
Energy diversity and efficiency	<p>We support policies that promote energy diversity and economic development in a manner consistent with our commitment to responsible, efficient, and sustainable use of natural resources.</p>
Sustainability reporting	<p>We support sustainability and ESG reporting policies that provide meaningful information to stakeholders – including investors and customers – to enable informed decision-making. We advocate for reporting requirements that deliver an appropriate level of detail and accuracy to meet stakeholder needs, without being overly burdensome or diverting resources from driving real progress. We also support a national standard that will avoid a patchwork of state requirements (or in the case of EU, differing member state requirements), simplifying the reporting process.</p>
Extended producer responsibility	<p>We support market-driven efforts to advance the recovery and recycling of paper and fiber-based packaging. We do not believe new EPR frameworks are necessary for materials with demonstrated high recovery and recycling rates, such as paper and fiber-based packaging, though we recognize EPR can play a role in improving recycling outcomes for materials with low recovery rates. Where EPR programs exist, we support scaled and modulated fee structures that reflect actual material recovery and recyclability.</p>
Infrastructure	<p>We support government and private investments in energy, water, and transportation infrastructure where we operate and in the development of cost-efficient renewable and low-carbon energy, as well as carbon capture and storage technologies.</p>

Policy Focus Area	Graphic Packaging Position
Mandatory composition requirements	We do not support mandated composition requirements on packaging, as material selection should be determined based on fitness-for-use and established sustainable packaging design criteria. We support policies that recognize recycled content and the renewable attributes of materials to advance circular resource use models.
Product bans	We generally oppose policies that limit consumer choice by banning, restricting, or imposing a fee or tax on paper and paperboard packaging and products.
Recycling	As a large user of recovered fiber and a manufacturer of recycled paperboard packaging, we support legislation and regulation that does not hinder our ability to purchase, process, or use recycled materials. We support policies that expand public access to recycling and increase material recovery. We also support harmonized approaches for packaging waste collection systems and recyclability testing, as well as best practices that keep material in the recycling stream and improve overall recycling rates.
Transportation	As a large freight shipper, we support policies that make our truck, port, and rail shipments more efficient and competitive, and support the transition to low-emissions transportation.
Workforce	We support efforts at the state, federal, or international levels of government to address workforce education, skills gaps, and training, and foster an inclusive, fair, and diverse workplace.

Political Contributions

The Graphic Packaging-PAC is a voluntary, nonpartisan political action committee registered with the U.S. Federal Election Commission (FEC). It provides eligible employees and members of our Board of Directors with a legal and ethical way to pool personal contributions to support candidates who support issues important to our business, employees, and other stakeholders.

The Graphic Packaging-PAC is a separate, segregated fund that operates in full compliance with the Federal Election Campaign Act and applicable state and federal election laws and regulations, including disclosure requirements. All contributions to Graphic Packaging-PAC are used to support candidates directly or through contributions to industry trade associations' PACs. The Graphic Packaging-PAC is independent of any political party, candidate, or organization. As permitted by law, Graphic Packaging defrays all administrative costs and operating expenses of the PAC. Oversight is provided by a Board of Directors — comprised of Graphic Packaging executives — that reviews and approves all political contributions and related payments.

The Graphic Packaging-PAC Board evaluates candidates on a bipartisan basis according to the following criteria:

- Reputation, integrity, and a demonstrable commitment to ethical political conduct.
- Position and voting record on issues that matter most to the Company and our industry.
- Represents a geographical region with a Graphic Packaging facility or employee center.
- Leadership position and committee assignments.
- Potential for election success.

In the U.S., all financial contributions comply strictly with applicable federal and state laws governing contribution limits, sources, eligibility, and reporting requirements. Contribution information is a matter of public record and is readily available to interested parties through the FEC, Internal Revenue Service, and Secretaries of State. The Graphic

Packaging-PAC files reports with the FEC, as required, detailing all receipts and disbursements.

Graphic Packaging does not make independent expenditures or contribute to Super PACs, 527 groups, or 501(c)(4) entities and does not contribute to any ballot initiatives. On rare occasions, we may use corporate financial resources to support our position on important public policy issues. Corporate contributions follow the same rigorous review and approval process as the Graphic Packaging-PAC.

Trade Association and Civic Organization Engagement

Graphic Packaging participates in many trade and business associations whose collective purpose is to promote common business interests for member companies. Engagement with these associations assists us in managing priorities relevant to Graphic Packaging and the paperboard packaging industry. Trade associations support member companies by:

- Advocating for company and industry positions.
- Building critical relationships.
- Educating elected officials, appointed leaders, and the public.
- Supporting informed, sound public policy decisions.
- Engaging in cross-industry initiatives to advance paper-based material use, recovery, and recycling.

Trade and business associations often represent diverse memberships with varying views on public policy. While Graphic Packaging seeks to play a leadership role in key trade associations, we may at times disagree with positions taken by an association or its membership. It is our practice, and our preference, to work within the association policy process to ensure our views are communicated and represented in association policy, strategy, and tactics. Regardless of any association position, Graphic Packaging's public policy positions are determined independently and reflect the Company's own views.

Graphic Packaging has also developed partnerships with civic leagues and social welfare organizations (as per Section 501(c)(4) of the U.S. Internal Revenue Code) that play an important role in public policy discussions and may engage in advocacy-related activities. Memberships in, and contributions to, trade associations and civic organizations are reviewed by our Vice President, Government Affairs (VPGA), and subject to the same authorization and oversight process to political spending activities.

Governance

Graphic Packaging is committed to the highest standards of ethical conduct in its participation in the political process, as reflected in the Company's Code of Conduct. The VPGA directs the Company's public policy strategy and oversees corporate political activity, including spending, and political contributions through the Graphic Packaging-PAC and participation in trade associations and civic organizations. These activities are subject to periodic audits to ensure compliance with applicable laws and Company policies.

Our VPGA regularly provides updates on our public policy activities for our Executive Leadership Team and Board of Directors. Additional information on our governance framework and corporate policies is provided in the Sustainability Governance and Business Practices sections of our 2025 Impact Report and in GRI 2-9 Governance Structure and Composition, 2-13 Delegation of Responsibility for Managing Impacts, GRI 2-23 Policy Commitments, 205 Anti-corruption, and 206 Anti-competitive Behavior, as well as at our [Disclosures and Company Policies](#) webpage.

We collaborate with internal and external groups to uphold our principles of transparency, integrity, and compliance, including legal counsel, audit teams, and FEC consultants.

Political contributions

Graphic Packaging is committed to providing transparent disclosure of its interactions with public officials, including advocacy, political donations, and lobbying expenditures. The data are provided in the tables below and in reports published on the FEC website under Graphic Packaging International, LLC Political Action Committee ID: C00282566. Letters we author or sign onto through our advocacy efforts are a matter of public record.

U.S. Political Contributions, Lobbying, and Trade Association Expenses^a

	2022	2023	2024	2025
Political Campaigns	\$ 7,000	\$ 8,500	\$ 12,500	\$ 8,500
Political Organizations	\$ 17,500	\$ 15,000	\$ 15,000	\$ 12,500
Lobbyists or Lobbying Organizations	\$ 520,000	\$ 518,000	\$ 545,000	\$ 727,000
Trade Associations ^a	\$ 2,963,000	\$ 3,206,000	\$ 3,570,000	\$ 3,302,000

a. Trade association expenses include annual dues, support for industry initiatives, and may include some industry lobbying costs.

Trade Association^a and Industry Association Memberships With Dues Exceeding \$25,000 Paid by Graphic Packaging in 2025

- 100% Recycled Paperboard Alliance
- American Forest & Paper Association
- British Printing Industries Federation
- European Carton Makers Association
- Foodservice Packaging Institute and Paper Cup Alliance
- Forest Resources Association
- Georgia Forestry Association
- German Folding Carton Association (FFI)
- National Association of Manufacturers
- National Council for Air and Stream Improvement
- Paperboard Packaging Council
- Pro Carton
- Recycled Paper Technical Association

a. Trade and business associations as qualified under Section 501(c)(6) of the U.S. Internal Revenue Code.

U.S. Candidates or Organizations^a That Received Graphic Packaging-PAC Political Contributions in 2025

Committee name	Party	Amount
State and Community Level		
ForestPAC (GA)	N/A	\$ 5,000
National Level		
AF&PA PAC	N/A	\$ 5,000
Business Industry PAC	N/A	\$ 2,500
Individual Candidates		
U.S. Congressman Sanford Bishop (Sanford Bishop for Congress)	Democrat	\$ 2,500
Senator John Boozman (Boozman for Arkansas)	Republican	\$ 1,000
Senator John Thune (Friends of John Thune)	Republican	\$ 1,000
U.S. Congressman Dan Newhouse (Dan Newhouse for Congress)	Republican	\$ 1,000
U.S. Congressman Dave Joyce (Friends of Dave Joyce)	Republican	\$ 1,000
Senator John Cornyn (Texans for Senator John Cornyn Inc.)	Republican	\$ 500
Senator Tammy Baldwin (Tammy Baldwin for Senate)	Democrat	\$ 500
Senator Tammy Duckworth (Tammy for Illinois)	Democrat	\$ 500
U.S. Congressman Bruce Westerman (Westerman for Congress)	Republican	\$ 500

a. Political organizations qualified under Section 527 of the U.S. Internal Revenue Code



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