

Anti-Harassment

Graphic Packaging International is committed to providing its employees, applicants, vendors, contractors, visitors and customers with a working environment that is free of all forms of unlawful discrimination or harassment.

In furtherance of this commitment, the Company prohibits harassment or discrimination against an individual because of his or her gender or sex (including pregnancy and breast feeding), race, color, religion, age, national origin, ancestry, citizenship status, genetic information, gender identity and expression, marital status, sexual orientation, disability or protected medical condition, uniform service member and veteran/military status, or any characteristic protected by applicable federal, state or local law (hereinafter referenced in this policy as “protected classification”).

The Company’s policy against unlawful harassment applies to all employees, including supervisors and managers, as well as to all unpaid interns and volunteers. The Company prohibits managers, supervisors and employees from harassing co-workers as well as the Company’s customers, vendors, suppliers, independent contractors and others doing business with the Company. Any such harassment will subject an employee to disciplinary action, up to and including immediate termination. The Company likewise prohibits its customers, vendors, contractors and others doing business with the Company from harassing our employees.

Under California law, employees may be held personally liable for harassing conduct that violates the California Fair Employment and Housing Act.

Examples of Prohibited Sexual Harassment: Sexual harassment includes a broad spectrum of conduct including harassment based on sex, gender, gender identity or expression, or sexual orientation. By way of illustration only, and not limitation, some examples of unlawful and unacceptable behavior include:

- unwanted sexual advances;
- offering an employment benefit (such as a raise, promotion or career advancement) in exchange for sexual favors, or threatening an employment detriment (such as termination or demotion) for an employee’s failure to engage in sexual activity;
- visual conduct, such as leering, making sexual gestures, and displaying or posting sexually suggestive objects or pictures, cartoons or posters;
- verbal sexual advances, propositions, requests or comments;
- sending or posting sexually-related messages, videos or messages via text, instant messaging, or social media;
- verbal abuse of a sexual nature, graphic verbal comments about an individual’s body, sexually degrading words used to describe an individual, and suggestive or obscene letters, notes or invitations;
- physical conduct, such as touching, groping, assault, or blocking movement;
- physical or verbal abuse concerning an individual’s gender, gender identity or gender expression; and
- verbal abuse concerning a person’s characteristics such as pitch of voice, facial hair or the size or shape of a person’s body, including remarks that a male is too feminine or a woman is too masculine.

Examples of What Constitutes Other Prohibited Harassment: In addition to the above listed conduct, the Company strictly prohibits harassment concerning any other protected classification. By way of illustration only, and not limitation, such prohibited harassment includes:

- racial or ethnic slurs, epithets, and any other offensive remarks;
- jokes, whether written, verbal, or electronic;
- threats, intimidation, and other menacing behavior;
- sending or posting harassing messages, videos or messages via text, instant messaging, or social media, and
- other harassing conduct based on one or more of the protected categories identified in this policy.

Anti-Harassment (continued)

If you have any questions about what constitutes harassing behavior, ask your supervisor or another member of management.

The Company does not consider conduct in violation of this policy to be within the course and scope of employment or the direct consequence of the discharge of one's duties. Accordingly, to the extent permitted by law, the Company reserves the right not to provide a defense or pay damages assessed against any employee whose conduct violates this policy.

Reporting Violations:

Any employee who believes he or she has been harassed in the workplace, or who witnesses or learns about any action that could be viewed as harassment, should report the conduct immediately to their local Human Resources representative or Corporate Human Resources for investigation. Notification of the problem is essential to us. The Company cannot help resolve a harassment problem unless it receives notice of the problem. It is each employee's responsibility to bring concerns and/or problems to the Company's attention so the situation at issue can be addressed. The Company takes all complaints of unlawful harassment seriously.

The Graphic Packaging Business Conduct Alertline toll-free phone number (1.866.898.3750) or website at www.gpibusinessconductalertline.ethicspoint.com provides a confidential and results-oriented way to report conduct violations related to this policy.

A thorough and timely investigation of all complaints will be conducted and, if necessary, corrective action appropriate to the findings will be taken. The Company prohibits employees from hindering internal investigations and the internal complaint procedure. All complaints of unlawful harassment reported to management will be treated as confidentially as possible, consistent with the Company's need to conduct an adequate investigation. The Company does not tolerate retaliation against any employee for making a good faith complaint under this policy or cooperating in any investigation of any complaint under this policy.

All supervisors are responsible for preventing harassment and discrimination in the workplace and are obligated to report any offensive or harassing behavior they observe or complaints they receive to Human Resources. Supervisors who knew about offensive or harassing behavior and took no action to stop it or failed to report the harassment to an appropriate Company official may also be subject to discipline, up to and including termination of employment.

Policy Against Retaliation:

The Company is committed to prohibiting retaliation against those who themselves or whose family members report, oppose, or participate in an investigation of alleged wrongdoing in the workplace. By way of example only, participating in such an investigation, includes, but is not limited to:

- Filing a complaint with a federal or state enforcement or administrative agency;
- Participating in or cooperating with a federal or state enforcement agency conducting an investigation of the Company regarding alleged unlawful activity;
- Testifying as a party, witness, or accused regarding alleged unlawful activity;
- Making or filing an internal complaint with the Company regarding alleged unlawful activity;
- Providing informal notice to the Company regarding alleged unlawful activity;
- Assisting another employee who is engaged in any of these activities.

The Company is further committed to prohibiting retaliation against qualified employees who request a reasonable accommodation for any known physical or mental disability and employees who request a reasonable accommodation of their religious beliefs and observances.

Anyone who believes that he or she is being retaliated against, or who observes retaliation by or against another person, should immediately contact Human Resources or the Graphic Packaging Business Conduct Alertline.

Any employee determined to be responsible for violating this policy will be subject to appropriate disciplinary action, up to and including termination. Moreover, any employee, supervisor or manager who condones or ignores potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination.