

Equal Employment Opportunity

Graphic Packaging International is, and will continue to be, an equal opportunity employer.

We recognize that a strong commitment to the principles of Equal Employment Opportunity is vital to our success as an organization. This commitment reflects our belief that an employee's ability to do the job is the primary consideration in our recruitment and selection process, and in all other employment-related decisions, including recruiting, hiring, discipline, promotions, the administration of compensation and benefits, shift assignment, transfers, training, tuition assistance, leaves of absence, layoffs/recalls, and terminations.

It is our policy not to discriminate against any employee or applicant because of race, color, religion, age, gender (identity and expression) or sex (including pregnancy, breastfeeding, and related medical conditions), national origin, ancestry, marital status, citizenship status, sexual orientation, disability or protected medical condition, uniform service member and veteran / military status, genetic information, or any characteristic protected by applicable federal, state, or local law (hereinafter referenced in this policy as "protected classification"). All such discrimination is unlawful and all persons involved in the operations of the Company are prohibited from engaging in this type of conduct.

In addition, it is the policy of the Company to employ persons age 18 and over.

This policy, not to discriminate in employment, includes but is not limited to the following:

- The Company will employ those applicants who possess the necessary skills, education, and experience for the position, without regard to any protected classification.
- The Company will train during employment and select for training and apprenticeship programs without regard to any protected classification.
- No employee will aid, abet, compel, coerce or conspire to discharge or cause another employee to resign because of any protected classification.
- In accordance with The Equal Pay Act, the Company will not discriminate among employees in the payment of salaries or wages to one sex at a rate less than the rate paid the opposite sex, for equal work on jobs requiring equal skill, effort, responsibility, and performed under similar working conditions. This law applies to all domestic Company employees.
- The Company will establish rates of pay and terms, conditions, or privileges of employment without regard to any protected classification.
- The Company will use, for job referral purposes, only those employment agencies that in making referrals do not discriminate on the basis of any protected classification.

Pay Transparency Nondiscrimination Provision

The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

Individuals with Disabilities

Graphic Packaging International welcomes applications from qualified individuals with disabilities. The Company will comply with the provisions of Section 504 of the Vocational Rehabilitation Act and its implementing regulations, as well as the Americans with Disabilities Act of 1990.

Equal Employment Opportunity (continued)

Specifically, Graphic Packaging International will do the following:

- Consider all disabled applicants for employment using the same criteria that are used for employment of non-disabled persons,
- Consider disabled employees for promotion using the same criteria that are used for promotion of non-disabled persons,
- Reasonably accommodate known disabilities of otherwise qualified individuals so that they can perform the essential functions of the job, unless such an accommodation would result in undue hardship to the Company,
- Take steps to make its facilities barrier-free and accessible according to applicable federal and state statutes,
- Educate employees to the fact that disabled individuals are to be employed by the Company and should not be discriminated against, and
- Provide a comfortable, safe, accessible, and pleasant working environment for disabled employees.

A qualified applicant or employee who has a disability may request a reasonable accommodation by contacting his or her local Human Resources representative or the Corporate Human Resources office. In offering employment or promotions to disabled individuals, the Company will not reduce the amount of compensation offered because of any disability income, pension, or other benefits received from any other source.

All employees are required to comply with safety standards. Applicants who pose a direct threat or a significant risk to the health or safety of themselves or others in the workplace, will not be hired, unless the threat can be eliminated via a reasonable accommodation. Employees who pose a direct threat to the health or safety of themselves or others in the workplace will be placed on appropriate leave until an organizational decision can be made in regard to the employee's immediate employment situation.

Requests for Accommodation:

The Company is committed to complying with all laws protecting qualified individuals with disabilities, as well as employees', unpaid interns' and volunteers' religious beliefs and observances. This policy extends to all aspects of our employment practices, including but not limited to, recruiting, hiring, discipline, termination, promotions, transfers, compensation, benefits, training, leaves of

absence, and other terms and conditions of employment. In accordance with the Company's Disability Accommodation Policy and Procedure, the Company will provide a reasonable accommodation for any known physical or mental disability of a qualified individual and/or employees' religious beliefs and observances, provided the requested accommodation does not create an undue hardship for the Company and/or does not pose a direct threat to the health or safety of others in the workplace and/or to the individual.

Immigration Law Compliance:

Graphic Packaging International is committed to employing only individuals who are legally authorized to work in the United States in its domestic operations, and does not unlawfully discriminate on the basis of citizenship or national origin.

- At the time of hire, all employees, citizens or non-citizens, must present appropriate documentation to establish their identity and employment eligibility. Within three (3) business days of the date employment begins, the Company must use the documentation presented as evidence of identity and employment eligibility to submit an electronic Employment Eligibility Verification Form I-9 ("I-9 Form"), to the E-Verify system. If employees are unable to present the required documentations within three business days, they must present a receipt for the application for documentation within three business days and the actual documentation within 90 days.
- Employees whose work status authorization is of limited duration must present appropriate documentation reflecting an extension of this authorization or otherwise indicating their eligibility to continue to work prior to the expiration of their original work status authorization period or they will be subject to discharge upon the expiration of their employment eligibility.

Employees may raise questions or concerns about immigration law compliance without fear of retaliation or reprisal.

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Reporting Violations

The Human Resources Department provides any job applicant or employee an opportunity for review of any action believed not to conform to this policy. In addition, you should immediately report any instance of unlawful discrimination to your Human Resources representative or Corporate Human Resources Department regardless of whether you or someone else is the subject of the discrimination.

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.

The Company will conduct an investigation of every issue that is brought to its attention. Detailed reports—including names, descriptions, and actual events or statements made—will greatly enhance the Company's ability to investigate.

The Company prohibits any and all retaliation for alleging a violation of this policy, submitting a report of unlawful discrimination, or cooperating in any investigation. Any supervisor or employee who retaliates against an employee who raises a concern or those involved in the investigation will be disciplined, up to and including termination of employment. However, if after investigating any complaint, the Company determines that an employee has provided false information regarding the complaint, disciplinary action may be taken against the individuals who gave the false information.

If the investigation determines that prohibited discrimination or other conduct in violation of this policy has occurred, the Company will take disciplinary action, up to and including termination of employment, against those who engaged in the misconduct. The Company will also evaluate whether other employment practices should be added or modified in order to deter and prevent that conduct in the future.

If you have a question on the fair administration of these guidelines, contact your Human Resources representative.