

Human Rights

Respect is one of Graphic Packaging International's core values.

The Company is committed to ensuring that people are treated fairly and with dignity and respect throughout the Company and the communities in which it operates. The **Code of Business Conduct and Ethics**, which applies to Graphic Packaging's subsidiaries and affiliates across the globe, serves as a guideline for all Company and employee activities. The Company demonstrates its commitment to human rights in the following ways:

Diversity:

Graphic Packaging values diversity within its workforce and the contributions each employee makes. The Company has a long-standing commitment to equal opportunity and is dedicated to maintaining working environments that are free from discrimination or harassment based on gender or sex (including pregnancy), race, color, religion, national origin, ancestry, age, disability, marital status, sexual orientation, genetic information, gender identity, political affiliation or veteran/ military status.

Labor:

Graphic Packaging prohibits the hiring of individuals who are under 18 years of age for positions that would expose them to hazardous work or materials. The Company also prohibits the use of all forms of forced labor, including slave and prison labor, and any form of human trafficking.

The Company operates in full compliance with applicable laws governing employees' working hours, compensation, and benefits.

Safety:

Graphic Packaging strives to attain a high level of safety in all activities and operations to promote the health and safety of employees. Occupational health and safety programs are designed to protect employees by emphasizing early recognition, correction, elimination or control of hazardous situations, as well as, early detection and treatment of injuries and illnesses. Likewise, the Company is committed to working with employees to maintain a work environment free from violence, threats of violence, and physical intimidation or coercion.

Freedom of Association:

The Company respects employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees have chosen representation by a third party, Graphic Packaging has bargained in good faith and will continue to do so. The Company does not tolerate retaliation against employees for their lawful affiliation with any labor organization.

Suppliers:

Graphic Packaging wants to work with suppliers whose standards with respect to diversity, labor practices, safety and freedom of association align with those of the Company. Its goal is 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 its suppliers are fully set forth in Graphic Packaging's Supplier Sustainability Guideline.

Any employee who has questions about this policy or would like to report a potential violation may contact his or her local Human Resources representative, Corporate Human Resources, or the Law Department. The Graphic Packaging Business Conduct Alertline toll-free phone number (1.866.898.3750) or website at www.gpibusinessconductalertline.ethicspoint.com also provides a confidential and results-oriented way to report violations related to this policy.

For individuals in the European Union, please note that the Alertline phone and web services only permit you to report financial, accounting and auditing matters. Any issues arising under the Human Rights Policy should be made directly to local management, Human Resources or the Law Department.