

**Supplier Sustainability**

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1.0 PURPOSE  
 The purpose of this document is to outline GPI's Supplier Sustainability expectations.

2.0 SCOPE  
 The scope of this guideline impacts all new and existing suppliers.

3.0 RESPONSIBILITIES

**Important:** When a title of a position is listed in this procedure, it relates to that position or its equivalence.

Below are the roles and responsibilities discussed within this document.

Role	Responsibility
Buyer	Communicates Supplier Sustainability Guideline expectations to prospective suppliers.
Commodity Manager	Review new vendor registrations, ensure new suppliers agree to Supplier Sustainability expectations and include Supplier Sustainability expectations in eRFPs.
Supplier Diversity Manager	Oversee and manage the Supplier Sustainability program.

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4.0 SUPPLIER SUSTAINABILITY GUIDELINE

**1. A Message to Our Respected Suppliers**

Graphic Packaging International, LLC (GPI) believes our Suppliers are vital to our success and, accordingly, endeavors to choose Suppliers who demonstrate a commitment to strong ethics and business conduct standards. GPI's procurement principles are to source for the best value, obtain business requirements legally and ethically, and provide equal opportunity. This Supplier Sustainability Guideline (the "Guideline") affords GPI and its Suppliers guidance on establishing and maintaining relationships based on our core values and beliefs.

**2. Health and Safety**

Suppliers must conduct themselves in a manner consistent with all applicable safety standards, including governmental requirements, operations and facility specific safety requirements and contractual requirements.

All contractors, subcontractors, vendors and/or consultants shall procure and maintain required levels of insurance as defined by the GPI Risk Management Department. All agreements must be accompanied by proof of insurance prior to work being performed at any GPI location.

**2.1. Labor and Human Rights**

Suppliers must support the protection of the human rights of workers and treat all workers with dignity and respect as understood by the international community. Suppliers may not discriminate in hiring and employment practices on the basis of race, sex, color, age, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin or marital status.

**2.2. Prevent Involuntary Labor and Human Trafficking**

Suppliers must not use any form of forced, bonded, indentured or prison labor. All work must be voluntary, and workers should be free to terminate their employment with reasonable notice. Suppliers must comply with GPI's Anti-Trafficking and Human Rights Policy and abide by Executive Order 13267, which outlines the U.S. Government's zero-tolerance policy with respect to human trafficking.

**2.3. Prevent Under Age Labor**

Child labor is strictly prohibited. Suppliers must not employ underage individuals as defined by applicable child labor laws.

**3. Social Responsibility and Ethical Dealings**

Suppliers must be fully committed to the fair business practices and the highest standards of ethical conduct.

**3.1. Comply with Antitrust and Competition Laws**

Suppliers must prohibit agreements or measures that are misleading or deceptive or that unreasonably reduce competition or restrain trade. Suppliers must also comply with all applicable laws and regulations regarding fair competition and antitrust.

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**3.2. Protect Confidential Information**

Suppliers should protect GPI’s confidential information by keeping it secure, limiting access to those individuals whose jobs require such information, and avoiding discussion of confidential information in public areas. Some Suppliers may also learn personal confidential information of GPI employees or other individuals in connection with their relationship with GPI. Suppliers should adequately safeguard such information and protect it against unauthorized disclosure.

**3.3. Comply with Securities and Insider Trading Laws**

In connection with their relationship with GPI, Suppliers may obtain access to financial information, operating results, and plans relating to GPI that have not been made public. This information may be “material” and federal securities laws prohibit a person having such information from trading in our securities or providing that information to others. People who possess this type of information may not trade our securities until the information has been publicly distributed, and then only in accordance with applicable laws.

**3.4. Not Make or Accept Improper Payments**

Suppliers should uphold the highest standards of moral and ethical conduct. Suppliers must not make illegal payments to influence an act or decision of an official, party or candidate to use his, her or its influence with the government or governmental department or agency to assist GPI in obtaining, retaining or directing business to GPI, or any person or other company affiliated with GPI.

**3.5. Avoid Conflicts of Interest**

Suppliers and GPI employees should avoid conflicts of interest or appearances of conflicts of interest. Conflicts of interest may not always be clear-cut, so if there is any reasonable doubt of compliance with GPI’s Guideline, the GPI employee’s supervisor and/or the GPI Law Department should be consulted immediately.

**3.6. Conflict Minerals**

GPI’s goal is to use only those Conflict Minerals (meaning gold, cassiterite, columbite-tantalite and wolframite, together with their derivatives tin, tantalum and tungsten) that do not directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo and nine adjoining countries. These Conflict Minerals are referred to herein as being “conflict free.” To achieve this goal, GPI will exercise due diligence with its suppliers consistent with the framework set forth in the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Mineral from Conflict-Affected and High-Risk

Areas. GPI expects our Suppliers to cooperate in providing information to confirm that the Conflict Minerals in our supply chain are conflict free. GPI strongly prefers to purchase from Suppliers who will certify that their products do not contain Conflict Minerals or, if their products do contain these minerals, that they are conflict free. Accordingly, GPI will, where feasible, purchase only from those Suppliers who can certify that their products do not contain Conflict Minerals or that the Conflict Minerals used therein are conflict free.

Supplier certifies via this registration process that the products it sells to GPI do not contain Conflict Minerals or, if such products do contain these minerals, that they are conflict free.

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**4. Commit to Sustainable Business Practices**

Suppliers must comply with all applicable laws, including laws relating to health and safety, labor, human rights, securities and antitrust and the environment. GPI reserves the right to decline to deal with Suppliers who do not comply with the law.

**4.1. Operate with Financial Integrity**

Suppliers must not make false, inaccurate or intentionally misleading entries in their accounting books, records or communication with external or internal auditors. If GPI reasonably believes there is a question concerning the financial integrity or stability of a Supplier, GPI may require a Supplier to provide documentation showing its financial stability.

**4.2. Seek Approval of Subcontractors**

Suppliers may not use subcontractors without prior approval from GPI, and only after the subcontractor has agreed to comply with this Guideline. Suppliers must ensure that any subcontractor used has ethical and business practices that are similar to GPI's practices.

**4.3. Only Authorized Representatives May Approve Contracts and Agreements**

Agreements and contracts for goods and services may only be approved and signed by authorized representatives of GPI through our Delegation of Authority matrix and limits. Suppliers are prohibited from attempting to solicit written approval from GPI employees other than the Senior Vice President of Supply Chain.

Company Name \_\_\_\_\_

Authorized Signature: \_\_\_\_\_

Printed Name/Title \_\_\_\_\_

Date \_\_\_\_\_

