

LRQA Independent Assurance Statement

Relating to GPI's Assertion for the Financial Year 2019

This Assurance Statement has been prepared for Graphic Packaging International LLC in accordance with our contract.

Terms of Engagement

Lloyd's Register Quality Assurance, Inc. (LRQA) was commissioned by Graphic Packaging International LLC (GPI) to provide independent assurance on its assertion for the Financial Year 2019 and Base Year 2016 against the assurance criteria below to a limited level of assurance and materiality of the professional judgment of the verifier using ISO 14064 - Part 3 for greenhouse gas data.

Our assurance engagement covered GPI's global operations and activities and specifically the following requirements:

- Verifying conformance with:
 - World Resources Institute / World Business Council for Sustainable Development Greenhouse Gas Protocol: A corporate accounting and reporting standard, revised edition (otherwise referred to as the WRI/WBCSD GHG Protocol) for the GHG data¹
- Evaluating the accuracy and reliability of data and information for only the selected indicators listed below:
 - Direct (Scope 1) and Energy Indirect (Scope 2) GHG emissions for FY2019 and Base Year 2016;
 - Other Indirect (Scope 3) emissions for FY2019 in GPI's North American operations;
 - Scope 3 GHG emissions verified by LRQA only include the categories listed in Table 1 below;
 - Electricity Use for FY2019 and Base Year FY2016

GPI's GHG Assertion excludes the following GHG emissions sources:

- Mobile emissions from company cars;
- Mobile emissions from rail;
- Fugitive emissions from on-site landfills;
- Fugitive emissions from on-site wastewater treatment;
- Fugitive emissions from coal piles;
- Fugitive emissions from HFCs, PFCs, SF6;
- Purchased steam, hot water, and chilled water; and
- Process emissions

LRQA's responsibility is only to GPI. LRQA disclaims any liability or responsibility to others as explained in the end footnote. GPI's responsibility is for collecting, aggregating, analysing and presenting all the data and information within the Assertion and for maintaining effective internal controls over the systems from which the Assertion is derived. Ultimately, the Assertion has been approved by, and remains the responsibility of GPI.

LRQA's Opinion

Based on LRQA's approach nothing has come to our attention that would cause us to believe that GPI has not, in all material respects:

- Met the requirements of the criteria listed above; and
- Disclosed accurate and reliable performance data and information as summarized in Table 1 and 2 below.

The opinion expressed is formed on the basis of a limited level of assurance² and at the materiality of the professional judgement of the verifier.

¹ <http://www.ghgprotocol.org/>

Table 1. Summary of GPI's Key Data for FY2019:

Description	Quantity	Units
Scope 1 GHG emissions	1,318,747	Tonnes CO ₂ e
Scope 1 Biogenic emissions	5,652,245	Tonnes CO ₂ e
Scope 2 GHG emissions (Location-based) ¹	757,538	Tonnes CO ₂ e
Scope 2 GHG emissions (Market-based) ¹	824,155	Tonnes CO ₂ e
Scope 3 GHG emissions (includes only North American Operations)		Tonnes CO ₂ e
Purchased goods and services	1,987,798	
Upstream T&D	212,842	
Fuel and Energy Related activities	38,268	
Waste generated in operations	40,074	
Business travel	19,596	
Employee commuting	36	
Electricity Use	1,558,993	MWh
Note 1: Scope 2, Location-based and Scope 2, Market-based are defined in the GHG Protocol Scope 2 Guidance, 2015		

Table 2. Summary of GPI's Key Data for Base Year 2016:

Description	Quantity	Units
Scope 1 GHG emissions	1,257,469	Tonnes CO ₂ e
Scope 1 Biogenic emissions	5,714,382	Tonnes CO ₂ e
Scope 2 GHG emissions (Location-based) ¹	789,906	Tonnes CO ₂ e
Scope 2 GHG emissions (Market-based) ¹	793,037	Tonnes CO ₂ e
Electricity Use	1,584,040	MWh
Note 1: Scope 2, Location-based and Scope 2, Market-based are defined in the GHG Protocol Scope 2 Guidance, 2015		

LRQA's Approach

LRQA's assurance engagements are carried out in accordance with our verification procedure. The following tasks were undertaken as part of the evidence gathering process for this assurance engagement:

- interviewing relevant employees of the organization responsible for managing GHG emissions data and records;
- assessing GPI's data management systems to confirm they are designed to prevent significant errors, omissions or mis-statements in the Assertion.

² The extent of evidence-gathering for a limited assurance engagement is less than for a reasonable assurance engagement. Limited assurance engagements focus on aggregated data rather than physically checking source data at sites. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

- verifying historical GHG emissions data and records at an aggregated level for calendar year 2019 and base year 2016.

LRQA's Standards, Competence and Independence

LRQA implements and maintains a comprehensive management system that meets accreditation requirements for ISO 14065 *Greenhouse gases – Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition* and ISO/IEC 17021 *Conformity assessment – Requirements for bodies providing audit and certification of management systems* that are at least as demanding as the requirements of the International Standard on Quality Control 1 and comply with the *Code of Ethics for Professional Accountants* issued by the International Ethics Standards Board for Accountants.

LRQA ensures the selection of appropriately qualified individuals based on their qualifications, training and experience. The outcome of all verification and certification assessments is then internally reviewed by senior management to ensure that the approach applied is rigorous and transparent.

LRQA is GPI's certification body for social audits under SMETA. The verification and certification assessments are the only work undertaken by LRQA for GPI and as such does not compromise our independence or impartiality.

Signed

Dated: August 14, 2020



Heather I. Moore, P.E.

LRQA Lead Verifier

On behalf of Lloyd's Register Quality Assurance, Inc. (LRQA), 1330 Enclave Parkway, Suite 200, Houston, TX 77077

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