

Human Rights

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

Graphic Packaging is committed to ensuring that people are treated fairly and with dignity and respect throughout the Company, its subsidiaries, in our supply chain and in the communities in which Graphic Packaging operates across the globe. The Company's Core Values of Respect, Integrity, Teamwork, Relationships and Accountability form the foundation of our **Code of Conduct**, which applies to Graphic Packaging's subsidiaries and affiliates and serves as a guideline as to how we engage with employees, customers, suppliers, and the community. The Company's Code of Conduct and Human Rights Policy encompass the international human rights principles set forth in the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and its two corresponding covenants, the International Bill of Rights, the United Nations Conventions on the Rights of the Child, and the United Nations Convention on the Elimination of Discrimination against Women. Graphic Packaging's approach to its business operations is informed by the OECD Guidelines for Multinational Enterprises, and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Impact.

The Company demonstrates its commitment to human rights in the following ways:

Child Labor

Graphic Packaging complies with local laws prohibiting child labor. The Company does not hire individuals under the age of 15 and prohibits the hiring of individuals under the age of 18 for positions that would expose them to hazardous work or materials.

Community and Stakeholder Engagement

Graphic Packaging recognizes that we have a direct impact on the communities in which we operate and that it is vital to respect fundamental human rights in our operations, supply chain and in the communities in which we operate. The Company's leaders are responsible for engaging with our stakeholders to gain their perspectives and to consider and integrate the input received into our business decisions and activities when possible. As a result, our leaders and employees are engaged in a wide range of local and regional civic, philanthropic, and other community groups to address human rights issues, including those of indigenous people, related to our businesses. The Company provides sponsorship and

support to numerous local and national programs and activities that promote the fulfillment of human rights, with a special emphasis on our Three Pillars of Food, Education, and Sustainability.

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 and 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, veteran/military status, and any other status protected by applicable law. Graphic Packaging is an equal opportunity employer and maintains affirmative action plans in each of its United States facilities.

Forced Labor

Graphic Packaging prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

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.

Health and Safety

Safety is paramount at Graphic Packaging, and we strive to attain a high level of safety in all activities and operations to promote the health and safety of employees, contractors, suppliers, and visitors. Occupational health and safety programs are designed to protect employees by emphasizing early recognition, correction, elimination or control of hazardous situations, and early detection and treatment of injuries and illnesses. Employees receive regular training on safety policies, regulations, and rules that apply to their job and are responsible for complying with the same.

Human Rights (continued)

Property, Water and Sanitation Rights

Graphic Packaging acknowledges that clean drinking water and sanitation are life-sustaining and essential human rights. The Company also acknowledges and recognizes that access to land is important for human development; poverty reduction; and access to economic, social and cultural rights. Graphic Packaging is committed to addressing the human rights implications of land and water use in our supply chain and helping to protect the communities and indigenous people who work and live near our operations through proper sanitation.

Security

Graphic Packaging is committed to working with employees to achieve and maintain a work environment free from violence, threats of violence, harassment and physical intimidation or coercion. The Company evaluates internal and external threats and implements security safeguards, as necessary, to protect its employees. Such safeguards are provided while maintaining employees' rights to privacy.

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. Our goal is to eliminate human trafficking from our supply chain and 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 global Supplier Code of Conduct.

Training and Compliance

The Board of Directors has responsibility for the Company's Code of Conduct and Human Rights Policy and holds Graphic Packaging's leaders responsible for the engagement of all employees to ensure compliance with applicable laws and regulations; implementation of our Human Rights, Anti-Harassment and Equal Employment Opportunity and other policies; and transparent reporting of the Company's health, safety, and environmental performance. The Company regularly trains employees on the Code of Conduct, maintaining a respectful workplace that is free of harassment and discrimination, health and safety, and other policies and procedures that reinforce the Company's commitment to Human Rights and the expectation that everyone with whom we engage is treated with dignity and respect.

Wages and Working Hours

Graphic Packaging strives to compensate employees competitively relative to our industry and local labor markets as well as any applicable collective bargaining agreements. The Company operates in full compliance with applicable laws governing employees' working hours, compensation, and benefits.

Graphic Packaging uses due diligence to identify and prevent human rights risks in our business and supply chain. If you have questions about this policy or would like to report a potential violation, please contact the local Human Resources representative, Corporate Human Resources, or the Law Department. Employees may also report concerns via the Graphic Packaging Business Conduct Alertline toll-free phone number for their country of origin (1.866.898.3750 in the U.S.) or website at www.gpibusinessconductalertline.ethicspoint.com.