

Human Rights Policy (Global)

Purpose

Graphic Packaging strives to be a role model in the packaging industry regarding safe and responsible business conduct, a good corporate citizen, and a partner to all our stakeholders. The Company values people and respects their individual dignity, rights, and aspirations as well as their cultural heritage. Consequently, we care about the impacts of our operations and of our business decisions. We acknowledge the sovereignty of countries and their role to stipulate laws. Countries have the duty to protect human rights and companies the obligation to comply with the laws while respecting human rights.

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 following:

- United Nations (UN) Guiding Principles on Business and Human Rights;
- International Bill of Rights (which includes the UN Universal Declaration of Human Rights, the International Covenant on Civil and Political rights, and the International Covenant on Economic, Social and Cultural Rights);
- United Nations Conventions on the Rights of the Child; and
- UN Convention on the Elimination of Discrimination against Women.

Graphic Packaging's approach to its business operations is informed by the Organization for Economic Cooperation and Development, Guidelines for Multinational Enterprises, the International Labor Organization's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises, and the Ten Principles of the United Nations Global Compact.

Scope

This Policy applies to all applicants, employees, contractors, interns, suppliers, customers, and visitors of all Graphic Packaging legal entities worldwide.

Policy

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. Any incidents of child labor will be subject to immediate remediation as provided in our Child Labor and Remediation Policy.

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, and other community groups to address human rights issues, including those of indigenous people, related to our

businesses. Through its philanthropic actions, the Company provides sponsorship and support to numerous local and national programs and activities that promote the fulfillment of human rights.

Diversity

Graphic Packaging values diversity within its workforce and the contributions each employee makes. We strive to create a fair, diverse, and inclusive workplace, based on mutual trust, and where employees treat each other with respect and dignity. 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. We do not tolerate any kind of harassment or other types of abuse.

Forced Labor

Graphic Packaging prohibits the use of all forms of forced labor in our operations and supply chain; including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking. Our goal is to eliminate human trafficking and forced labor from our supply chain and to use only those products that do not finance or otherwise benefit armed groups in the Democratic Republic of Congo and nine adjoining countries. In furtherance of this goal, Graphic Packaging requires its employees, contractors, and suppliers to refrain from the following:

- Engaging in the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion for the purpose of subjecting that person to involuntary servitude, peonage, debt bondage or slavery;
- Engaging in sex trafficking, which means the recruitment, harboring, transportation, provision or obtaining of a person for the purpose of a commercial sex act, where the sex act is induced by force, fraud or coercion or involves a person under 18 years of age;
- Procuring commercial sex acts;
- Using forced labor;
- Destroying, concealing, confiscating or otherwise denying access by an employee to the employee's identity or immigration documents such as passports or drivers' licenses;
- Using misleading or fraudulent methods in recruiting or offering employment to persons, including making material misrepresentations regarding wages, benefits, location of the work, living conditions, housing, and associated costs (if provided by the Company or its agents), any costs to be charged to the employee and hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting occurs;
- Charging employees recruitment fees;
- Failing to provide return transportation or to pay the cost of return transportation for an employee who is not a national of the country in which the work is performed and who was brought into that country to perform the work (unless the employee is legally permitted to remain in the country of employment and chooses to do so following the completion of work);
- Providing or arranging housing that fails to meet the host country's housing and safety standards; and
- Failing to provide a description of all the pertinent details of employment to an employee and, where required by law, failing to provide an employment agreement in a language the employee understands.

Freedom of Association

The Company respects employees' right to join, form or not to join a works council or 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 under our control, suppliers, visitors, neighbors, and the environment surrounding facilities. 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 to promote safety-conscious behavior, and they are responsible for complying with the same to prevent work-related accidents. In addition, we assess risks, both incident probability and potential impact, to determine appropriate protective measures and continuously work to be prepared for emergency response in case of incidents.

We develop and promote safe products as well as the safe applications and use thereof. Our product stewardship efforts identify potential risks in handling, use, and disposal of our products, and advises accordingly to minimize potential negative impacts when our products are used responsibly in the manner intended.

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 operations, and we expect our suppliers to do the same.

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 recognizes that we cannot act alone to advance human rights and wants to work with suppliers whose standards with respect to diversity, labor practices, safety and freedom of association align with those of the Company. Because we are engaged and/or embedded in many global supply chains, we rely on and expect our value chain partners to respect and comply with international human rights standards and to set similar expectations with their subsequent supply chain partners. We also expect them to have processes in place to prevent, mitigate, and remediate human rights violations, that they may cause or contribute to. We do not ever want to be linked, either directly or indirectly, to any human rights violation as an accomplice or as a profiteer.

The Company's expectations for its suppliers are fully set forth in Graphic Packaging's Global Supplier Code of Conduct. Our Global Supplier Code of Conduct is part of our standard purchasing contracts and conditions of purchase. Should we become aware of human rights violations in our value chain, we will immediately address the issue with our direct partners and urge them to end the practices immediately. We reserve the right to terminate a business relationship if a supplier fails to meet these obligations.

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 Policy, Anti-Harassment and Anti-Discrimination Policy, 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.

We do not tolerate any form of corruption and strive for fair business practices. Where states lack the ability or willingness to fulfil their own duty to protect human rights, we stay committed to respecting human dignity and rights, but without assuming governmental roles.

Wages and Working Hours

Graphic Packaging is not only committed to paying a living wage but 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; and we are committed to ensuring that employees are provided equal pay for equal work, regardless of race, gender, or other immutable characteristics.

Awareness and Dialog

Graphic Packaging uses due diligence to identify and prevent human rights risks in our business and supply chain. Questions about this Policy or reports of potential violations should be made to a local or assigned human resources representative, corporate human resources, or the law department. Employees may also report concerns via the Graphic Packaging Business Conduct Alertline via its website at <http://www.gpibusinessconductalertline.ethicspoint.com> or via the toll-free number for your country. The Graphic Packaging Alertline is available 24 hours per day. Reports may be made anonymously if the reporter chooses.

Country-specific Business Conduct Alertline telephone numbers:

Australia	1800565761	Italy	800 725 944
Austria	0800 017868	Japan	0800-700-9401
Belgium	0800 77 076	Mexico	800 681 6714
Brazil	0800 000 0572	Netherlands	0800 0229398
Canada	1.866.898.3750 1.855.350.9393	New Zealand	0800 426 361
China	400 120 3531	Nigeria	0-708-060-1816, then 866-898-3750
Croatia	800-528-422	Norway	80062436
Estonia	8000044232	Poland	800005072
Finland	800416130	Russia	8 (800) 301-85-89
France	0.800.90.2500	South Korea	00798 14 203 0389
Germany	0800 1810751	Spain	900.991.498
Greece	0.080.012.6576	Sweden	020-088 00 16
Indonesia	0800 1401907	Switzerland	0800 000 329
Ireland	1800 851 822	United Kingdom	0800 048 5494
		United States	1.866.898.3750

Graphic Packaging, at its sole discretion, reserves the right to amend or modify this Policy at any time and for any reason.