

# LR Independent Assurance Statement

## Relating to GPI's GHG Assertion for the Calendar Year 2020

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

### Terms of Engagement

Lloyd's Register Quality Assurance, Inc. (LR) was commissioned by GPI to provide independent assurance of its assertion ("the Report") for the calendar year 2020 against the assurance criteria below to a limited level of assurance and materiality of the professional judgement of the verifier using LR's verification procedure and ISO 14064 - Part 3 for greenhouse gas emissions. LR's verification procedure is based on current best practise and is in accordance with ISAE 3000 and ISAE 3410.

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 emissions data<sup>1</sup>.
- Evaluating the accuracy and reliability of data and information for only the selected indicators listed below:
  - Direct (Scope 1), Energy Indirect (Scope 2) and Other Indirect (Scope 3) GHG emissions;
    - Scope 3 GHG emissions verified by LR only include North American operations, and are limited to the following Scope 3 categories: Purchased goods and services, Upstream transportation and distribution, Fuel and energy related activities, Waste generated in operations, Business travel, and Employee commuting.
  - Electricity Use

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 hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), Purchased steam, hot water, and chilled water; and Process emissions.

LR's responsibility is only to GPI. LR 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 Report and for maintaining effective internal controls over the systems from which the Report is derived. Ultimately, the Report has been approved by, and remains the responsibility of GPI.

### LR's Opinion

Based on LR's approach, except for the effect of the matters described in the Basis for Qualified Opinion, 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 below.

The opinion expressed is formed on the basis of a limited level of assurance<sup>2</sup> and at the materiality of the professional judgement of the verifier.

---

<sup>1</sup> <http://www.ghgprotocol.org/>

<sup>2</sup> 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.

### Basis for Qualified Opinion

GPI's report does not include energy and emissions data from three converting facilities. This omission is not material.

**Table 1. Summary of GPI Key Data for CY2020**

Description	Quantity	Units
Scope 1 GHG emissions	1,441,475	Tonnes CO <sub>2</sub> e
Scope 1 Biogenic emissions	5,543,564	Tonnes CO <sub>2</sub> e
Scope 2 GHG emissions (Location-based) <sup>1</sup>	652,277	Tonnes CO <sub>2</sub> e
Scope 2 GHG emissions (Market-based) <sup>1</sup>	680,468	Tonnes CO <sub>2</sub> e
Scope 3 GHG emissions <sup>2</sup> :		
Purchased goods and services	2,141,192	Tonnes CO <sub>2</sub> e
Upstream T&D	79,651	
Fuel and Energy Related activities	33,369	
Waste generated in operations	32,750	
Business travel	5,904	
Employee commuting	35	
Electricity Use	1,468,545	MWh
Note 1: Scope 2, Location-based and Scope 2, Market-based are defined in the GHG Protocol Scope 2 Guidance, 2015		
Note 2: Scope 3 emissions only include North American operations, and were calculated in the Quantis Scope 3 evaluator tool using spend-based emission factors, with the exception of Employee Commuting and Fuel and Energy Related activities.		

### LR's Approach

LR'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 and energy data and records;
- assessing GPI's data management systems to confirm they are designed to prevent significant errors, omissions or mis-statements in the Report; We did this by reviewing the effectiveness of data handling procedures, instructions and systems, including those for internal quality control; and
- verifying historical GHG emissions and energy data & records at an aggregated level for the calendar year 2020.

### LR's Standards, Competence and Independence

LR 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.

LR 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.

LR is GPI's certification body for ISO 9001 and 14001 at two sites and social audits under SMETA. The verification and certification assessments are the only work undertaken by LR for GPI and as such does not compromise our independence or impartiality.

Signed

Dated: June 25, 2021

Heather Moore, P.E.  
LR Lead Verifier  
On behalf of Lloyd's Register Quality Assurance, Inc.,  
1330 Enclave Parkway, Suite 200 Houston, TX 77077  
LR reference: UQA00001505 / 4394976

Lloyd's Register Group Limited, its affiliates and subsidiaries, including Lloyd's Register Quality Assurance Inc., and their respective officers, employees or agents are, individually and collectively, referred to in this clause as 'Lloyd's Register'. Lloyd's Register assumes no responsibility and shall not be liable to any person for any loss, damage or expense caused by reliance on the information or advice in this document or howsoever provided, unless that person has signed a contract with the relevant Lloyd's Register entity for the provision of this information or advice and in that case any responsibility or liability is exclusively on the terms and conditions set out in that contract.

The English version of this Assurance Statement is the only valid version. Lloyd's Register Group Limited assumes no responsibility for versions translated into other languages.

This Assurance Statement is only valid when published with the Report to which it refers. It may only be reproduced in its entirety.

Copyright © Lloyd's Register Quality Assurance Limited, 2021. A member of the Lloyd's Register Group.