

W0. Introduction

W0.1

(W0.1) Give a general description of and introduction to your organization.

Graphic Packaging International (GPI), headquartered in Atlanta, Georgia, is a leading provider of paperboard packaging for a wide variety of products from food and beverage to other consumer products in many regions in the world. The company is one of the largest producers of folding cartons and holds a leading market position in coated unbleached kraft (CUK) paperboard, coated-recycled boxboard, and folding carton packaging. The company's customers include some of the most widely recognized companies in the world. For more information please visit www.graphicpkg.com.

GPI's paperboard manufacturing operations rely on a water-intensive practices for which our water use is primarily driven by our mills, virgin and recycled. As such, we have prioritized the quantification and disclosure of mill water withdrawals, discharge, and consumption and have thereby excluded facilities contributing to our conversion operations and corporate and divisional offices from our disclosure hereinafter. We plan to include these non-paper mill facilities in prospective quantitative water use analyses and disclosures.

Certain statements regarding the expectations of Graphic Packaging Holding Company ("GPHC" and, together with its subsidiaries, the "Company"), including, but not limited to, the Company's plans or estimates with respect to energy use reductions, water usage and climate related events in this report constitute "forward-looking statements" as defined in the Private Securities Litigation Reform Act of 1995. Such statements are based on currently available operating, financial and competitive information and are subject to various risks and uncertainties that could cause actual results to differ materially from the Company's historical experience and its present expectations. These risks and uncertainties include, but are not limited to, the Company's ability to obtain permits and other administrative approvals, changes in revenue due to climate related concerns, and supply chain disruptions. Undue reliance should not be placed on such forward-looking statements, as such statements speak only as of the date on which they are made and the Company undertakes no obligation to update such statements, except as may be required by law. Additional information regarding these and other risks is contained in Part I, "Item 1A., Risk Factors" of the Company's 2017 Annual Report on Form 10-K, and in other filings with the Securities and Exchange Commission.

W0.2

(W0.2) State the start and end date of the year for which you are reporting data.

| | Start date | End date |
|----------------|----------------|------------------|
| Reporting year | January 1 2017 | December 31 2017 |

W0.3

(W0.3) Select the countries/regions for which you will be supplying data.

- Canada
- United States of America

W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response.

- USD

W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

- Companies, entities or groups over which operational control is exercised

W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?

- Yes

W0.6a

(W0.6a) Please report the exclusions.

| Exclusion | Please explain |
|---|--|
| GPI conversion operations have been excluded from this reporting. | Water use at GPI is primarily driven by our mills, virgin and recycled. As such, due to the limited data availability, reporting feasibility and lesser magnitude of consumption at facilities outside of the mills (conversion operations and corporate and divisional offices), those facilities have been excluded from GPI's disclosure. |

W1. Current state

W1.1

(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.

| | Direct use importance rating | Indirect use importance rating | Please explain |
|--|------------------------------|--------------------------------|--|
| Sufficient amounts of good quality freshwater available for use | Vital | Important | Direct Use: Good quality freshwater is vital for our operations because high-quality water is required for the processing of fiber and cooling to produce high quality paperboard. This is determined to be vital because future paperboard production and the related profitability of the organization could be affected if the water supply was insufficient. Indirect Use: Good quality freshwater is important for our supply chain, such as our woodbaskets, other upstream paperboard raw materials. This is determined to be important because water is a key component of quality upstream materials, primarily fiber, for which poor quality or lower quantities of accessible fiber could negatively affect GPI's production output. Future water dependency is not expected to change (vitaly important for direct and important for indirect use) given GPI's focus on paperboard production for the food, foodservice and beverage industry in which water as a coolant and agent for breaking down fiber is critical. |
| Sufficient amounts of recycled, brackish and/or produced water available for use | Important | Neutral | Direct Use: Recycled water is vital for our operations because high-quality water is required for the processing of fiber and cooling to produce high quality paperboard. This is determined to be vital because future paperboard production and the related profitability of the organization could be affected if the water supply was insufficient. Indirect Use: Produced water is important for our supply chain, such as our woodbaskets, other upstream paperboard raw materials. This is determined to be important because water is a key component of quality upstream materials, primarily wood chips, for which poor quality or lower quantities of accessible fiber could negatively affect GPI's production output. Future water dependency is not expected to change (vitaly important for direct and important for indirect use) given GPI's focus on paperboard production for the food, foodservice, and beverage industry in which water as a coolant and agent for breaking down fiber is critical. |

W1.2

(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

| | % of sites/facilities/operations | Please explain |
|---|----------------------------------|---|
| Water withdrawals – total volumes | 76-99 | GPI monitors our water withdrawals and discharge across all of our operations. As the paperboard mills represent the most significant amount of water use by GPI, we have prioritized our quantitative analysis of the results from our monitoring activities within our disclosure. Water monitoring for all facilities is in the assessment and development stages. |
| Water withdrawals – volumes from water stressed areas | 76-99 | GPI monitors our water withdrawals and discharge across all of our operations. As the paperboard mills represent the most significant amount of water use by GPI, we have prioritized our quantitative analysis of the results from our monitoring activities within our disclosure. Water monitoring for all facilities is in the assessment and development stages. |
| Water withdrawals – volumes by source | 76-99 | GPI monitors our water withdrawals and discharge across all of our operations. As the paperboard mills represent the most significant amount of water use by GPI, we have prioritized our quantitative analysis of the results from our monitoring activities within our disclosure. Water monitoring for all facilities is in the assessment and development stages. |
| Produced water associated with your metals & mining sector activities - total volumes | <Not Applicable> | <Not Applicable> |
| Produced water associated with your oil & gas sector activities - total volumes | <Not Applicable> | <Not Applicable> |
| Water withdrawals quality | 76-99 | GPI monitors a selection of our paperboard mills' water quality. In particular the Macon mill tests the pH conductivity and temperature from 1 of 2 of our active wells, which source our groundwater on an annual basis to comply with permit requirements in addition to daily monitoring the intake flow and turbidity, which is monitored by utilities as an input for the boiler feed. |
| Water discharges – total volumes | 76-99 | GPI monitors our water withdrawals and discharge across all of our operations. As the paperboard mills represent the most significant amount of water use by GPI, we have prioritized our quantitative analysis of the results from our monitoring activities within our disclosure. Water monitoring for all facilities is in the assessment and development stages. |
| Water discharges – volumes by destination | 76-99 | GPI monitors our water withdrawals and discharge across all of our operations. As the paperboard mills represent the most significant amount of water use by GPI, we have prioritized our quantitative analysis of the results from our monitoring activities within our disclosure. GPI treats water before discharge and we partner with the waste treatment in the local community. Water monitoring for all facilities is in the assessment and development stages. |
| Water discharges – volumes by treatment method | 76-99 | GPI monitors our water withdrawals and discharge across all of our operations. As the paperboard mills represent the most significant amount of water use by GPI, we have prioritized our quantitative analysis of the results from our monitoring activities within our disclosure. GPI treats water before discharge and we partner with the waste treatment in the local community. Water monitoring for all facilities is in the assessment and development stages. |
| Water discharge quality – by standard effluent parameters | 76-99 | GPI monitors our water withdrawals and discharge across all of our operations. As the paperboard mills represent the most significant amount of water use by GPI, we have prioritized our quantitative analysis of the results from our monitoring activities within our disclosure. GPI treats water before discharge and we partner with the waste treatment in the local community. Water monitoring for all facilities is in the assessment and development stages. |
| Water discharge quality – temperature | 76-99 | GPI monitors our paperboard mills' water discharge quality and specifically temperature of the non-contact cooling water at the Kalamazoo mill by monitoring the temperature readings in the mixing zone areas on a weekly basis. |
| Water consumption – total volume | 76-99 | GPI monitors our water withdrawals and discharge across all of our operations. As the paperboard mills represent the most significant amount of water use by GPI, we have prioritized our quantitative analysis of the results from our monitoring activities within our disclosure. Water monitoring for all facilities is in the assessment and development stages. |
| Water recycled/reused | 76-99 | GPI recycles a large portion of the process water through recirculation in short loops. This reuse is particularly prominent in the operating of the paper machine. Additionally, through the clarification process, for which the water is clarified and sediment is removed from the water, effluent from this process is split into two streams for which a portion of it goes to the POTW and the rest comes back into GPI's process/reservoir at our Kalamazoo mill. Other recycling activities are conducted in other mills, including Macon in which clean condensate are reused for pulp washing and machine white water is reused for dilution makeup and machine showers. |
| The provision of fully-functioning, safely managed WASH services to all workers | 76-99 | Each facility has wash services. |

W1.2b

(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?

| | Volume (megaliters/year) | Comparison with previous reporting year | Please explain |
|-------------------|--------------------------|---|--|
| Total withdrawals | 53134 | Lower | The 4,454 megaliters decrease year over year or 8% is primarily driven by a change in estimation methodology. The maximum flow of the water clarifier flow valve was used in '16 and prior to estimate the flow of river water, while in 2017, the actual flow from the Parcview river water pump discharge was used to calculate the withdrawal. As such, we anticipate that we over estimated our withdrawal in prior years due to using estimated versus actual values. Moreover, 2017 was an exceptionally rainy year during which we had more storm water input into the mill that was not specifically measured. We anticipate opening 2 new mills in the following year, as such we expect total water withdrawal to increase overall in order to support new operating activities. |
| Total discharges | 49885 | Higher | A slight increase of 607 megaliters or 1% in discharge was observed during 2017. This is comparable to the prior year and no significant fluctuations have been noted. No anticipated significant changes in discharge rates. We anticipate opening 2 new mills in the following year, as such we expect total water discharge to increase overall in order to support new operating activities. |
| Total consumption | 3249 | Much lower | Total consumption is calculated on a company-wide calculation taking the difference between the available data representing total withdrawals and discharge from GPI's mill facilities. Given the overall decrease in withdrawal and increase in discharge, it is expected that the overall consumption would decrease year over year by approximately 5,061 megaliters or 61%. No anticipated significant changes in consumption rates. |

W1.2d

(W1.2d) Provide the proportion of your total withdrawals sourced from water stressed areas.

| | % withdrawn from stressed areas | Comparison with previous reporting year | Identification tool | Please explain |
|-------|---------------------------------|---|---------------------|--|
| Row 1 | 8.16 | This is our first year of measurement | WRI Aqueduct | The WRI Aqueduct tool was used to assess the proportion of withdrawal associated with all sites, and particularly the 7 highest water consuming mills, which are located in areas (determined by the geographical longitude and latitude coordinates) that are considered to have high or extremely high baseline water stress. This subtotal was compared to the total of water volume withdrawn tracked in FY17 across GPI's portfolio for which this was the first year in which we've measured our % of water withdrawn from stressed areas. |

W1.2h

(W1.2h) Provide total water withdrawal data by source.

| | Relevance | Volume (megaliters/year) | Comparison with previous reporting year | Please explain |
|--|--------------|--------------------------|---|--|
| Fresh surface water, including rainwater, water from wetlands, rivers, and lakes | Relevant | 27427 | Lower | Fresh surface water includes directly monitored and tracked volumes of river water as well as non-contact river water used for cooling. Compared to PY, there was a slight decrease of approximately 722 ML or 3%. Water is critical to paper making and is an essential input to our processes. Of the water that is used for our non-contact cooling and process water, river water represents the most significant portion of GPI's withdrawal source. Overall there is little to no expected change in withdrawal within the next year, however GPI is assessing projects that could reduce intake of water for non-contact cooling water in which evaporated losses would increase and discharge would decrease by reusing more non-contact cooling water and by maintaining the water at a higher temperature reducing energy demands. |
| Brackish surface water/seawater | Not relevant | <Not Applicable> | <Not Applicable> | GPI does not use or anticipate to use brackish surface water or seawater in operational processes. As such, there is no withdrawal to disclose. |
| Groundwater – renewable | Relevant | 3981 | Higher | GPI tracks groundwater - renewable withdrawal from 6 mills, for which all renewable groundwater is sourced and directly measured from wells, for which year over year withdrawal has increased by approximately 233 ML or 6%. Groundwater – renewable is withdrawn for the use as both process and non-contact cooling water in our mill operations. No changes in anticipated future withdrawal. |
| Groundwater – non-renewable | Relevant | 12546 | Much lower | GPI tracks groundwater - nonrenewable withdrawal from 1 mill, in which per direct measurements the year over year withdrawal has decreased by approximately 4,772 ML or 28%. Groundwater – nonrenewable is withdrawn for the use as both process and non-contact cooling water in our operations at our largest mill. No changes in anticipated future withdrawal. |
| Produced water | Relevant | 937 | This is our first year of measurement | GPI estimates produced water through a calculation of estimated moisture content of wood chips as a percentage of estimated wood chips brought into the 2 mills, less the moisture content of paperboard leaving the mills. No changes in anticipated future withdrawal. |
| Third party sources | Relevant | 8243 | Much higher | GPI withdraws and directly measures the volume of municipal grey water and municipal water used for operational processes in our mills to process fiber from wood chips to create paperboard. A slight increase of approximately 807 ML or 11% year over year. No changes in anticipated future withdrawal. |

W1.2i

(W1.2i) Provide total water discharge data by destination.

| | Relevance | Volume (megaliters/year) | Comparison with previous reporting year | Please explain |
|---------------------------------|--------------|--------------------------|---|--|
| Fresh surface water | Relevant | 36407 | Higher | Fresh surface water discharge represents all non-contact river water used for cooling that is returned to rivers in addition to all process water from the West Monroe mill, which is discharged to the river. Compared to the prior year, this discharge is slightly higher by approximately 456 ML or 1%. No change in anticipated discharge is expected. |
| Brackish surface water/seawater | Not relevant | <Not Applicable> | <Not Applicable> | Due to the nature of papermaking and fiber processing, no brackish or seawater is used in our operations. Moreover as all water from GPI's operations is discharged through fresh surface water (i.e. rivers) or to municipal waste water treatment facilities any salt water would contaminate the discharge sources and as such is dually excluded from our operations. There has been no change in practice compared to the prior year. No change in anticipated discharge is expected. |
| Groundwater | Not relevant | <Not Applicable> | <Not Applicable> | As all water from GPI's operations is discharged through fresh surface water (i.e. rivers) or to municipal waste water treatment facilities, no discharge to groundwater is observed. There has been no change in practice compared to the prior year. No change in anticipated discharge is expected. |
| Third-party destinations | Relevant | 13478 | Higher | All remaining process water is discharged through third party (municipal waste water treatment facilities) less the process water from the West Monroe Mill noted above. This discharge volume has increased slightly by approximately 151 ML or 1%. No change in anticipated discharge is expected. |

W1.2j

(W1.2) What proportion of your total water use do you recycle or reuse?

| | % recycled and reused | Comparison with previous reporting year | Please explain |
|-------|-----------------------|---|---|
| Row 1 | 76-99% | About the same | GPI does recycle and reuse process water in our operations. Water reuse and recycling is very process specific and while the specific application varies from mill to mill, West Monroe, the most water intensive mill is utilized as a basis for selecting GPI's overall percentage of water recycling and reuse. West Monroe estimates that approximately 83% of water is recycled and reused throughout our mill processes and expects this to remain about the same going forward. Additionally, the Kalamazoo mill recycles water primarily in the operation of our paper machine, where the Macon mill relies on reusing condensate and machine white water. Neither of the above mills have monitoring equipment installed to measure the amount of water recycled or reused, which is why the West Monroe estimate serves as a proxy. |

W1.4

(W1.4) Do you engage with your value chain on water-related issues?

Yes, our customers or other value chain partners

W1.4c

(W1.4c) What is your organization's rationale and strategy for prioritizing engagements with customers or other partners in its value chain?

GPI provides water usage data to our customers in order to provide insight to how water intensive our products are in manufacturing the paperboard in both the process and how much is discharged. This is significant and prioritized for GPI as many of our customers rely on this information in our decision making process for paperboard selection especially in the craft beer and soft drink industry.

Additionally, GPI engages with our communities especially in consideration of the source from where the water is withdrawn and is prioritized in respect for our reliance of shared resources. For example at West Monroe, GPI had withdrawn 10M gallons from the local aquifer causing the aquifer to be overdrawn. In response, the community approached GPI and proposed and implemented a treatment plan to clean the water to meet FDA drinking water quality standards. By obtaining approval from customers to use this as process water, GPI addressed concerns regarding the water quality expectations for input as a raw material for the papermaking process. As a result of this, less water needed to be withdrawn reducing withdrawal by 50%, defining the measure of success in which we were able to effectively collaborate and engage to achieve shared and measurable benefits.

Similarly, GPI engaged with a community water treatment facility in Middletown, Ohio, to whom we discharge water. At this facility the water is processed and cleaned and through the efforts at Graphic Packaging less water is discharged to the treatment facility. The project that Graphic Packaging implemented is a water tank that holds water until needed instead of discharging to the city water treatment facility. In addition to reducing mill water demand and discharged water the water treatment facility will less energy to process Graphic Packaging's discharged water.

W2. Business impacts

W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?

No

W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

No

W3. Procedures

W3.3

(W3.3) Does your organization undertake a water-related risk assessment?

Yes, water-related risks are assessed

W3.3a

(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.

Direct operations

Coverage

Full

Risk assessment procedure

Water risks are assessed as part of other company-wide risk assessment system

Frequency of assessment

Annually

How far into the future are risks considered?

2 to 5 years

Type of tools and methods used

Tools on the market

Tools and methods used

WRI Aqueduct

Comment

GPI reviews and assesses all risks, including exposure and potential liabilities when new assets are acquired. The Director of Risk engages with the C-Suite, Board and audit committees as necessary. Physical risks are reviewed biannually to determine whether all of GPI's physical assets and sites are protected from probable weather and geological events. All insurance coverage, including flood, is reviewed for which identified gaps are addressed with the audit committee biennially.

Supply chain

Coverage

None

Risk assessment procedure

<Not Applicable>

Frequency of assessment

<Not Applicable>

How far into the future are risks considered?

<Not Applicable>

Type of tools and methods used

<Not Applicable>

Tools and methods used

<Not Applicable>

Comment

Other stages of the value chain

Coverage

None

Risk assessment procedure

<Not Applicable>

Frequency of assessment

<Not Applicable>

How far into the future are risks considered?

<Not Applicable>

Type of tools and methods used

<Not Applicable>

Tools and methods used

<Not Applicable>

Comment

W3.3b

(W3.3b) Which of the following contextual issues are considered in your organization's water-related risk assessments?

| | Relevance & inclusion | Please explain |
|---|---------------------------|--|
| Water availability at a basin/catchment level | Relevant, always included | Water is critical to the process of paperboard manufacturing and all factors that could impact available withdrawn water are evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. |
| Water quality at a basin/catchment level | Relevant, always included | Water is critical to the process of paperboard manufacturing and all factors that could impact quality of withdrawn water are evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. |
| Stakeholder conflicts concerning water resources at a basin/catchment level | Relevant, always included | Water is critical to the process of paperboard manufacturing and all factors that could impact availability and quality of withdrawn water are evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. |
| Implications of water on your key commodities/raw materials | Relevant, always included | Water is critical to the process of paperboard manufacturing and all factors that could impact availability and quality of withdrawn water are evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. |
| Water-related regulatory frameworks | Relevant, always included | Water is critical to the process of paperboard manufacturing and all factors that could impact availability and quality of withdrawn water are evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. |
| Status of ecosystems and habitats | Relevant, always included | Water is critical to the process of paperboard manufacturing and all factors that could impact availability and quality of withdrawn water are evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. |
| Access to fully-functioning, safely managed WASH services for all employees | Relevant, always included | Water is critical to the process of paperboard manufacturing and all factors that could impact availability and quality of withdrawn water are evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. GPI has WASH services at all facilities. |
| Other contextual issues, please specify | Please select | |

W3.3c

(W3.3c) Which of the following stakeholders are considered in your organization's water-related risk assessments?

| | Relevance & inclusion | Please explain |
|--|---------------------------|--|
| Customers | Relevant, always included | Water is critical for processing paperboard and the quality is assessed when withdrawn, in the process and specifically with the finished paperboard. The finished board analysis is completed to meet regulatory and customer expectations. Customers are considered to be current and future stakeholders. |
| Employees | Relevant, always included | GPI ensures that our employees have access to good quality water, especially drinking water. Employees are essential to our operations and will continue to comprise our consideration of current and future stakeholders. |
| Investors | Relevant, always included | While GPI has not experienced direct investor inquiry or pressure related to water issues we have continued to assess and monitor water related issues as it is expected by our investors to manage strategically to deliver on financial commitments. Investors are considered to be current and future stakeholders. |
| Local communities | Relevant, always included | Water is assessed at each community and actions are taken when relevant. The example below provides context of a program at our West Monroe mill. West Monroe Mill: Reduce water draw from the Sparta Aquifer. GPI partnered with the city of West Monroe LA to reduce our draw of 10 million gallons per day from the Sparta Aquifer by 50% to 5 million gallons per day. The city waste treatment facility added an additional treatment process that ensures that waste treatment water meets FDA drinking water standards. That water is used as process water at GPI for making paperboard. Local communities are considered to be current and future stakeholders. |
| NGOs | Relevant, always included | Water is critical to the process of paperboard manufacturing and all factors that could impact availability and quality of withdrawn water are evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. Current and future water considerations are monitored and are assessed on an expectation basis. In that assessment the engagement of NGOs is determined. |
| Other water users at a basin/catchment level | Relevant, always included | Water is assessed at each community and actions are taken when relevant. The example below provides context of a program at our West Monroe mill. West Monroe Mill: Reduce water draw from the Sparta Aquifer. GPI partnered with the city of West Monroe LA to reduce our draw of 10 million gallons per day from the Sparta Aquifer by 50% to 5 million gallons per day. The city waste treatment facility added an additional treatment process that ensures that waste treatment water meets FDA drinking water standards. That water is used as process water at GPI for making paperboard. Other water users are considered to be current and future stakeholders. |
| Regulators | Relevant, always included | Primary engagement with regulators regards permitting rules and regulations, however GPI has employees who sit on industry groups, such as the GPFPA (Georgia Paper Forest Products Association), in which regulatory changes are closely observed. Regulators are considered to be current and future stakeholders. |
| River basin management authorities | Relevant, always included | Water is critical to the process of our paperboard at our mills and all factors that could impact availability and quality of withdrawn water is evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. River authorities are considered to be current and future stakeholders. |
| Statutory special interest groups at a local level | Relevant, always included | Water is critical to the process of our paperboard at our mills and all factors that could impact availability and quality of withdrawn water is evaluated annually and as needed. Further, discharged water factors are evaluated from a regulatory and ecological framework. The analysis and decisions are completed at a local, division and corporate level. Special interest groups are considered to be current and future stakeholders. |
| Suppliers | Relevant, not included | GPI provides a "Suppliers Expectations" document for our suppliers to sign. GPI fully expects that our suppliers have adequate policies in place to address our water needs. |
| Water utilities at a local level | Relevant, always included | Water is assessed at each community and actions are taken when relevant. The example below provides context of a program at our West Monroe mill. West Monroe Mill: Reduce water draw from the Sparta Aquifer. GPI partnered with the city of West Monroe LA to reduce our draw of 10 million gallons per day from the Sparta Aquifer by 50% to 5 million gallons per day. The city waste treatment facility added an additional treatment process that ensures that waste treatment water meets FDA drinking water standards. That water is used as process water at GPI for making paperboard. Water utilities are considered to be current and future stakeholders. |
| Other stakeholder, please specify | Please select | |

W3.3d

(W3.3d) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.

GPI has a fairly mature risk management department and process. Risks are evaluated at an organizational and asset level for our direct operations. When new assets are acquired the risk management department assesses any new or additional exposure to risk, the magnitude, as well as any possible pollution liability, which is incorporated into every asset that is owned by GPI. The Director of Risk Management coordinates with the Chief Officers as necessary and more formally reports biannually to the CEO and his staff to make property recommendations as to how GPI can better protect the physical assets within the portfolio.

Each of GPI's global locations are reviewed for potentially damaging weather events in order to evaluate what type of insurance coverages should be obtained for each facility. Biennially the Director of Risk Management reports to the audit committee to review all currently engaged insurance coverage and what gaps, if any, exist. If a gap is identified, the magnitude of risk is evaluated for which GPI considers the likelihood of an estimated loss event, any potential reputational risks and the potential financial impact, which informs the decision to purchase additional coverage or whether an alternative risk response is necessary.

W4. Risks and opportunities

W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes, only within our direct operations

W4.1a

(W4.1a) How does your organization define substantive financial or strategic impact on your business?

GPI defines substantive strategic impact on the business as any effect that would significantly disrupt, restrict, jeopardize or prohibit direct manufacturing operations to continue across a group of or an individual mill or other manufacturing facility responsible for a majority of the organization's materials used at the conversion facilities as part of the supply chain. Indicators used to identify substantive change within GPI's direct operations may include the existence of insurance claims, litigative action, damages or disruptions to operations and production that are material in nature. An example of substantive impact considered would include potential damages as a result of flooding risks that may impair the ability of GPI to operate our mills at a normal capacity.

W4.1b

(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?

| | Total number of facilities exposed to water risk | % company-wide facilities this represents | Comment |
|-------|--|---|---|
| Row 1 | 7 | 1-25 | GPI's facilities exposed to water risks with a substantive financial or strategic impact on the business primarily are represented by any of the mills responsible for the majority of the water use throughout the organization. Specifically, any risk that would jeopardize the functioning of the mill, especially for an extended or undefined period of time are considered substantive. There have been and will continue to be weather events or geographical changes, which may impinge on the ability for GPI to conduct operations as is the current state. For example, GPI engaged with our Congressional representatives and the Army Corps of Engineers to ensure dredging of the Ouachita river, which the West Monroe mill relies upon as the key withdrawal source, was undertaken so that withdrawal, discharge, and shipping activities could continue as normal. Without dredging, discharge would have been significantly limited also reducing the withdrawal rate, for which production could have been affected. |

W4.1c

(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive impact on your business, and what is the potential business impact associated with those facilities?

Country/Region

United States of America

River basin

St. Lawrence

Number of facilities exposed to water risk

2

% company-wide facilities this represents

1-25

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

1-25

Comment

Country/Region

United States of America

River basin

Mississippi River

Number of facilities exposed to water risk

2

% company-wide facilities this represents

1-25

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

26-50

Comment

Country/Region

United States of America

River basin

Altamaha River

Number of facilities exposed to water risk

1

% company-wide facilities this represents

1-25

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

1-25

Comment

Country/Region

United States of America

River basin

Other, please specify (Coyote Creek (San Francisco Bay))

Number of facilities exposed to water risk

1

% company-wide facilities this represents

1-25

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

1-25

Comment

Country/Region

Canada

River basin

St. Lawrence

Number of facilities exposed to water risk

1

% company-wide facilities this represents

1-25

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

1-25

Comment

W4.2

(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Region

United States of America

River basin

St. Lawrence

Type of risk

Physical

Primary risk driver

Increased water stress

Primary potential impact

Reduction or disruption in production capacity

Company-specific description

Stress on water resources, could limit or disrupt operational and production capacity at the mills, decreasing potential profitability of our papermaking processes. 2 mills, Kalamazoo and Battle Creek, MI are represented by this river basin. The overall water risk is considered medium to high at these two facilities, both located on the Kalamazoo River, center around quality, quantity and low upstream storage. These conditions are expected to continue. Both plants have focused on pretreatment of incoming supply and water conservation measures that have resulted in successful operation throughout varying conditions.

Timeframe

More than 6 years

Magnitude of potential impact

Medium

Likelihood

Unlikely

Potential financial impact

0

Explanation of financial impact

Depending on the nature of the water scarcity/stress, the financial impact would include lost revenue from decreased or ceased operations from product manufacturing.

Primary response to risk

Engage with local communities

Description of response

GPI maintains strong and ongoing relationships in the communities with which we operate. In the event of a potential water issue, GPI would first engage with the local community to collaborate and develop a plan of action.

Cost of response

0

Explanation of cost of response

Cost of response is representative of any costs associated with the facilitation of industry, non-profits and community stakeholders to ensure the water stress is mitigated, whether that may include installing an additional storage tank, dredging, or implementing of resource efficiency measures at the mill to improve water security for the mill and other water users of the shared water basin. No current projects are currently underway.

Country/Region

United States of America

River basin

Mississippi River

Type of risk

Physical

Primary risk driver

Increased water stress

Primary potential impact

Reduction or disruption in production capacity

Company-specific description

GPI notes that one of our withdrawal sources, the Sparta Aquifer, is currently overdrawn. Prior to evaluation GPI pulled ~10M gallons/day. The draw has since been reduced to ~5M gallons/day. Due to the stress on the aquifer from existing pressure from GPI and other community members the lack of water availability could limit or disrupt operational and production capacity at the mill, decreasing potential profitability, thereby increasing the focus on resource efficiency initiatives and transfer of source load.

Timeframe

More than 6 years

Magnitude of potential impact

High

Likelihood

Unlikely

Potential financial impact

0

Explanation of financial impact

Depending on the extent of the flooding and damage, the financial impact would include replacing and repairing any damaged equipment or infrastructure and lost revenue from decreased or ceased operations from product manufacturing.

Primary response to risk

Develop flood emergency plans

Description of response

In the event of a potential flooding event water issue GPI would first evaluate what measures are necessary to mitigate the risk to the fullest extent possible including ensuring insurance coverage is adequate and appropriate and physical precautionary measures are available. For example GPI's investment in an Aqua Dam to mitigate physical risks at our facilities and potential damages caused by severe flooding events.

Cost of response

1000000

Explanation of cost of response

Cost of response is representative of any additional insurance coverage deemed necessary resulting the physical risk review performed twice per year, audit committee insurance coverage gap review performed every 2 years and investment in physical mitigation measures, such as the Aqua Dam to mitigate against potential financial losses. No current projects are currently underway, however an AquaDam was procured in the prior period to mitigate against potential flood risks.

Country/Region

United States of America

River basin

Altamaha River

Type of risk

Physical

Primary risk driver

Increased water stress

Primary potential impact

Reduction or disruption in production capacity

Company-specific description

Stress on water resources, could limit or disrupt operational and production capacity at the mills, decreasing potential profitability. The Macon, GA Mill is represented by the Altamaha River basin. This mill has been assessed to have low to medium overall water risk experiences, medium to high baseline water stress, which is expected to continue. Water quality and quantity issues are addressed through water conservation measures. High risk of flooding is ameliorated with the cooperation of the local municipality.

Timeframe

More than 6 years

Magnitude of potential impact

Medium

Likelihood

Unlikely

Potential financial impact

0

Explanation of financial impact

Depending on the nature of the water scarcity/stress, the financial impact would include lost revenue from decreased or ceased operations from product manufacturing.

Primary response to risk

Engage with local communities

Description of response

GPI maintains strong and ongoing relationships in the communities with which we operate. In the event of a potential water issue, GPI would first engage with the local

community to collaborate and develop a plan of action.

Cost of response

0

Explanation of cost of response

Cost of response is representative of any costs associated with the facilitation of industry, non-profits and community stakeholders to ensure the water stress is mitigated, whether that may include installing an additional storage tank, dredging, or implementing of resource efficiency measures at the mill to improve water security for the mill and other water users of the shared water basin. No current projects are underway.

Country/Region

United States of America

River basin

Other, please specify (Coyote Creek (San Francisco Bay))

Type of risk

Physical

Primary risk driver

Drought

Primary potential impact

Reduction or disruption in production capacity

Company-specific description

Increased frequency of droughts and wild fires in the Western US could cause operational shut downs and limit or disrupt operational and production capacity of the mill, decreasing potential profitability. The Santa Clara, CA Mill is represented by the Coyote Creek/San Francisco Bay watershed, where overall water risk is medium to high; extremely high water baseline water stress has existed for some time and is expected to continue. The mill had aggressively implemented water conservation measures that have allowed it to come through recent severe drought without operational interruption. It is noted however, that this mill was closed as of December 2017 and will not be represented as part of our operational footprint in future review periods.

Timeframe

More than 6 years

Magnitude of potential impact

Medium

Likelihood

Unlikely

Potential financial impact

0

Explanation of financial impact

Depending on the extent of the effect on the drought and regional wild fires on GPI's wood basket, the financial impact would include lost revenue from decreased or ceased operations from product manufacturing.

Primary response to risk

Develop drought emergency plans

Description of response

In the event of a potential drought or wildfire, limiting GPI's wood basket or reducing ability to withdraw or discharge water GPI would first develop a drought emergency plan. This would include assessing the amount of lumber that could be obtained from another wood basket, evaluating if insurance coverage is adequate for an event such as this.

Cost of response

0

Explanation of cost of response

Cost of response is representative of any additional insurance coverage deemed necessary resulting the physical risk review performed twice per year, audit committee insurance coverage gap review performed every 2 years and evaluation and investment in water and resource efficiency reduction initiatives to mitigate against potential financial losses. No current projects are underway.

Country/Region

Canada

River basin

St. Lawrence

Type of risk

Physical

Primary risk driver

Increased water stress

Primary potential impact

Reduction or disruption in production capacity

Company-specific description

Stress on water resources, could limit or disrupt operational and production capacity at the mills, decreasing potential profitability. The East Angus, Quebec mill is represented by the St. Lawrence River basin, which experiences low to medium overall water risk and low baseline water stress, and is expected to continue.

Timeframe

More than 6 years

Magnitude of potential impact

Medium

Likelihood

Unlikely

Potential financial impact

0

Explanation of financial impact

Depending on the nature of the water scarcity/stress, the financial impact would include lost revenue from decreased or ceased operations from product manufacturing.

Primary response to risk

Engage with local communities

Description of response

GPI maintains strong and ongoing relationships in the communities with which we operate. In the event of a potential water issue, GPI would first engage with the local community to collaborate and develop a plan of action.

Cost of response

0

Explanation of cost of response

Cost of response is representative of any costs associated with the facilitation of industry, non-profits and community stakeholders to ensure the water stress is mitigated, whether that may include installing an additional storage tank, dredging, or implementing of resource efficiency measures at the mill to improve water security for the mill and other water users of the shared water basin. No current projects are underway.

W4.2c

(W4.2c) Why does your organization not consider itself exposed to water risks in its value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact?

| | Primary reason | Please explain |
|-------|--|---|
| Row 1 | Risks exist, but no substantive impact anticipated | At this time the risks have been assessed and there are adequate strategies in place to address any potential water impact. |

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?

No

W4.3b

(W4.3b) Why does your organization not consider itself to have water-related opportunities?

| | Primary reason | Please explain |
|-------|--------------------------|--|
| Row 1 | Judged to be unimportant | GPI has adequate water availability and so do competing paperboard manufacturers. At this time there is no perceived significant opportunity to leverage water availability for strategic advantage. GPI has recently completed an enterprise risk management assessment in which water-related opportunities were not deemed to be considered substantive or material by leadership. Such related opportunities and risks will be evaluated in real-time as they may arise during the company-wide enterprise risk management assessment, which occurs every two years or less, reviewed by the Board. The threshold for pursuing a substantive opportunity will reflect the change in current status ultimately reducing operational costs associated with water-related processes at our mills or provide relief in terms of an improved or resilient supply chain in which raw materials are reliably secured. |

W5. Facility-level water accounting**W5.1**

(W5.1) For each facility referenced in W4.1c, provide coordinates, total water accounting data and comparisons with the previous reporting year.

Facility reference number

Facility 1

Facility name (optional)

West Monroe Mill

Country/Region

United States of America

River basin

Mississippi River

Latitude

32.48675

Longitude

-92.15005

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

30358

Comparison of withdrawals with previous reporting year

Much lower

Total water discharges at this facility (megaliters/year)

29910

Comparison of discharges with previous reporting year

About the same

Total water consumption at this facility (megaliters/year)

448

Comparison of consumption with previous reporting year

Much lower

Please explain

Annual withdrawal and discharge represent metered data. Produced water is estimated using the average water composition of wood chips. This is the first year produced water is included in the withdrawal volumes at Facilities 1 and 2. Consumption data is estimated by the difference between annual withdrawal and discharge. No significant changes expected in future volumes. A much higher/lower threshold is defined as volume that has changed in excess of 10% compared to the previous year.

Facility reference number

Facility 2

Facility name (optional)

Macon, GA, Mill

Country/Region

United States of America

River basin

Altamaha River

Latitude

32.773784

Longitude

-83.631841

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

16276

Comparison of withdrawals with previous reporting year

Higher

Total water discharges at this facility (megaliters/year)

14988

Comparison of discharges with previous reporting year

Higher

Total water consumption at this facility (megaliters/year)

1287

Comparison of consumption with previous reporting year

Lower

Please explain

Annual withdrawal and discharge represent metered data. Produced water is estimated using the average water composition of wood chips. This is the first year produced water is included in the withdrawal volumes at Facilities 1 and 2. Consumption data is estimated by the difference between annual withdrawal and discharge. No significant changes expected in future volumes. A much higher/lower threshold is defined as volume that has changed in excess of 10% compared to the previous year.

Facility reference number

Facility 3

Facility name (optional)

Kalamazoo Mill

Country/Region

United States of America

River basin

St. Lawrence

Latitude

42.305634

Longitude

-85.578998

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

1825

Comparison of withdrawals with previous reporting year

Much lower

Total water discharges at this facility (megaliters/year)

1037

Comparison of discharges with previous reporting year

Lower

Total water consumption at this facility (megaliters/year)

788

Comparison of consumption with previous reporting year

Much lower

Please explain

Annual withdrawal and discharge represents metered data. Consumption data is estimated by the difference between annual withdrawal and discharge. No significant changes expected in future volumes at this mill. Thresholds for what is much higher or much lower are those in which volume has increased or decreased in excess of 10% respectively compared to the previous year.

Facility reference number

Facility 4

Facility name (optional)

Battle Creek Mill

Country/Region

United States of America

River basin

St. Lawrence

Latitude

42.314983

Longitude

-85.186171

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

1734

Comparison of withdrawals with previous reporting year

Much lower

Total water discharges at this facility (megaliters/year)

1695

Comparison of discharges with previous reporting year

Much lower

Total water consumption at this facility (megaliters/year)

39

Comparison of consumption with previous reporting year

Much lower

Please explain

Annual withdrawal and discharge represents metered data. Consumption data is estimated through a standard difference calculation between annual withdrawal and discharge. No significant changes expected in future volumes at this mill. Thresholds for what is much higher or much lower are those in which volume has increased or decreased in excess of 10% respectively compared to the previous year.

Facility reference number

Facility 5

Facility name (optional)

Middletown Mill

Country/Region

United States of America

River basin

Mississippi River

Latitude

39.519179

Longitude

-84.390795

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

1718

Comparison of withdrawals with previous reporting year

Higher

Total water discharges at this facility (megaliters/year)

1544

Comparison of discharges with previous reporting year

Higher

Total water consumption at this facility (megaliters/year)

174

Comparison of consumption with previous reporting year

Much higher

Please explain

Annual withdrawal and discharge represents metered data. Consumption data is estimated through a standard difference calculation between annual withdrawal and discharge. No significant changes expected in future volumes at this mill. Thresholds for what is much higher or much lower are those in which volume has increased or decreased in excess of 10% respectively compared to the previous year.

Facility reference number

Facility 6

Facility name (optional)

Santa Clara Mill

Country/Region

United States of America

River basin

Other, please specify (Coyote Creek)

Latitude

37.368486

Longitude

-121.941515

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

700

Comparison of withdrawals with previous reporting year

Lower

Total water discharges at this facility (megaliters/year)

378

Comparison of discharges with previous reporting year

Lower

Total water consumption at this facility (megaliters/year)

322

Comparison of consumption with previous reporting year

Lower

Please explain

GPI notes that the annual water withdrawal and discharge is measured by metered data at each individual mill. Consumption data is estimated through a standard difference calculation between annual withdrawal and discharge. No significant changes expected in future volumes at this mill. Thresholds for what is much higher or much lower are those in which volume has increased or decreased in excess of 10% respectively compared to the previous year.

Facility reference number

Facility 7

Facility name (optional)

East Angus Mill

Country/Region

United States of America

River basin

St. Lawrence

Latitude

45.481678

Longitude

-71.664126

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

522

Comparison of withdrawals with previous reporting year

Much lower

Total water discharges at this facility (megaliters/year)

332

Comparison of discharges with previous reporting year

Much lower

Total water consumption at this facility (megaliters/year)

190

Comparison of consumption with previous reporting year

Much lower

Please explain

GPI notes that the annual water withdrawal and discharge is measured by metered data at each individual mill. Consumption data is estimated through a standard difference calculation between annual withdrawal and discharge. No significant changes expected in future volumes at this mill. Thresholds for what is much higher or much lower are those in which volume has increased or decreased in excess of 10% respectively compared to the previous year.

W5.1a**(W5.1a) For each facility referenced in W5.1, provide withdrawal data by water source.****Facility reference number**

Facility 1

Facility name

West Monroe Mill

Fresh surface water, including rainwater, water from wetlands, rivers and lakes

11339

Brackish surface water/seawater

0

Groundwater - renewable

0

Groundwater - non-renewable

12546

Produced water

531

Third party sources

5942

Comment

All withdrawal data is sourced from direct measurements with the exception of produced water. GPI estimates produced water by calculating the moisture content of wood chips as a percentage of wood chips brought into the 2 mills, less the moisture content of paperboard leaving the mills. For fresh surface water, river water is the primary source of withdrawal. No anticipated changes in volume are noted. GPI relies on municipal supplied grey water for the remaining water withdrawal demand.

Facility reference number

Facility 2

Facility name

Macon, GA, Mill

Fresh surface water, including rainwater, water from wetlands, rivers and lakes

14943

Brackish surface water/seawater

0

Groundwater - renewable

353

Groundwater - non-renewable

0

Produced water

405

Third party sources

575

Comment

All withdrawal data is sourced from direct measurements with the exception of produced water. GPI estimates produced water by calculating the moisture content of wood chips as a percentage of wood chips brought into the 2 mills, less the moisture content of paperboard leaving the mills. For fresh surface water, river water is the primary source of withdrawal. No anticipated changes in volume are noted. GPI relies on municipal supplied water for the remaining water withdrawal demand.

Facility reference number

Facility 3

Facility name

Kalamazoo Mill

Fresh surface water, including rainwater, water from wetlands, rivers and lakes

98

Brackish surface water/seawater

0

Groundwater - renewable

286

Groundwater - non-renewable

0

Produced water

0

Third party sources

1441

Comment

All withdrawal data is sourced from direct measurements with the exception of produced water, which is estimated. For fresh surface water, river water is the primary source of withdrawal. No anticipated changes in volume are noted. GPI relies on municipal supplied water for the remaining water withdrawal demand.

Facility reference number

Facility 4

Facility name

Battle Creek Mill

Fresh surface water, including rainwater, water from wetlands, rivers and lakes

559

Brackish surface water/seawater

0

Groundwater - renewable

966

Groundwater - non-renewable

0

Produced water

0

Third party sources

209

Comment

All withdrawal data is sourced from direct measurements with the exception of produced water, which is estimated. For fresh surface water, river water is the primary source of withdrawal. No anticipated changes in volume are noted. GPI relies on municipal supplied water for the remaining water withdrawal demand.

Facility reference number

Facility 5

Facility name

Middletown Mill

Fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

Brackish surface water/seawater

0

Groundwater - renewable

1676

Groundwater - non-renewable

0

Produced water

0

Third party sources

42

Comment

All withdrawal data is sourced from direct measurements with the exception of produced water, which is estimated. GPI relies on municipal supplied water for the remaining water withdrawal demand.

Facility reference number

Facility 6

Facility name

Santa Clara Mill

Fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

Brackish surface water/seawater

0

Groundwater - renewable

700

Groundwater - non-renewable

0

Produced water

0

Third party sources

0

Comment

All withdrawal data is sourced from direct measurements with the exception of produced water, which is estimated.

Facility reference number

Facility 7

Facility name

East Angus Mill

Fresh surface water, including rainwater, water from wetlands, rivers and lakes

488

Brackish surface water/seawater

0

Groundwater - renewable

0

Groundwater - non-renewable

0

Produced water

0

Third party sources

34

Comment

All withdrawal data is sourced from direct measurements with the exception of produced water, which is estimated. For fresh surface water, river water is the primary source of withdrawal. No anticipated changes in volume are noted. GPI relies on municipal supplied water for the remaining water withdrawal demand.

W5.1b

(W5.1b) For each facility referenced in W5.1, provide discharge data by destination.

Facility reference number

Facility 1

Facility name

West Monroe Mill

Fresh surface water

29910

Brackish surface water/Seawater

0

Groundwater

0

Third party destinations

0

Comment

Volumes for each destination are sourced from direct measurements. All of West Monroe's process water is discharged to the river, as such no discharge is introduced to a brackish or groundwater environment or municipality.

Facility reference number

Facility 2

Facility name

Macon, GA, Mill

Fresh surface water

5272

Brackish surface water/Seawater

0

Groundwater

0

Third party destinations

9717

Comment

Volumes for each destination are sourced from direct measurements. All of Macon's non-contact cooling water is discharged to the river, where all process water is discharged to the municipality.

Facility reference number

Facility 3

Facility name

Kalamazoo Mill

Fresh surface water

13

Brackish surface water/Seawater

0

Groundwater

0

Third party destinations

1024

Comment

Volumes for each destination are sourced from direct measurements. All of Kalamazoo's non-contact cooling water is discharged to the river, where all process water is discharged to the municipality.

Facility reference number

Facility 4

Facility name

Battle Creek Mill

Fresh surface water

1212

Brackish surface water/Seawater

0

Groundwater

0

Third party destinations

483

Comment

Volumes for each destination are sourced from direct measurements. All of Battle Creek's non-contact cooling water is discharged to the river, where all process water is discharged to the municipality.

Facility reference number

Facility 5

Facility name

Middletown Mill

Fresh surface water

0

Brackish surface water/Seawater

0

Groundwater

0

Third party destinations

1544

Comment

Volumes for each destination are sourced from direct measurements. All wastewater is discharged to the municipality.

Facility reference number

Facility 6

Facility name

Santa Clara Mill

Fresh surface water

0

Brackish surface water/Seawater

0

Groundwater

0

Third party destinations

378

Comment

Volumes for each destination are sourced from direct measurements. All wastewater is discharged to the municipality.

Facility reference number

Facility 7

Facility name

East Angus Mill

Fresh surface water

0

Brackish surface water/Seawater

0

Groundwater

0

Third party destinations

332

Comment

Volumes for each destination are sourced from direct measurements. All wastewater is discharged to the municipality.

W5.1c

(W5.1c) For each facility referenced in W5.1, provide the proportion of your total water use that is recycled or reused, and give the comparison with the previous reporting year.

Facility reference number

Facility 1

Facility name

West Monroe Mill

% recycled or reused

76-99%

Comparison with previous reporting year

About the same

Please explain

Water is critical to papermaking; the water we borrow from the environment is responsibly returned. We invest in technologies, like water tanks, advanced strainers, and clarifying units to allow us to reuse more of our process water, to reduce our draw on water resources. We have implemented a structured water monitoring system to isolate additional water conservation opportunities. West Monroe estimated that 83% of water was recycled within the mill. We expect this to remain about the same.

Facility reference number

Facility 2

Facility name

Macon, GA, Mill

% recycled or reused

Not monitored

Comparison with previous reporting year

About the same

Please explain

Water is critical to papermaking and is responsibly returned to the environment. We invest in technologies, like water tanks, advanced strainers, and clarifying units. We have implemented a water monitoring system to isolate water conservation opportunities. Macon recycles water used in the paper machine process and uses wet scrubbers. Stripped condensate is reused for pulp washing and steam condensate is reclaimed for boiler feed water. No anticipated changes in trending are noted.

Facility reference number

Facility 3

Facility name

Kalamazoo Mill

% recycled or reused

Not monitored

Comparison with previous reporting year

About the same

Please explain

Water is critical to papermaking and is responsibly returned to the environment. We invest in technologies, like water tanks, advanced strainers, and clarifying units. We have implemented a water monitoring system to isolate conservation opportunities. Kalamazoo recirculates water in short loops for paper machine processing and reuses clarified water. We also split the final effluent stream between the POTW and recycled process water. No anticipated changes in trending are noted.

Facility reference number

Facility 4

Facility name

Battle Creek Mill

% recycled or reused

Not monitored

Comparison with previous reporting year

About the same

Please explain

Water is critical to papermaking, and the water we borrow from the environment is responsibly returned. We continue to invest in technologies, like water tanks, advanced strainers for water treatment, and clarifying units to allow us to reuse more of our process water, to reduce our draw on water resources. In addition, we have implemented a structured water monitoring system to help us isolate and find additional water conservation opportunities. No anticipated changes in trending are noted.

Facility reference number

Facility 5

Facility name

Middletown Mill

% recycled or reused

Not monitored

Comparison with previous reporting year

About the same

Please explain

Water is critical to papermaking, and the water we borrow from the environment is responsibly returned. We continue to invest in technologies, like water tanks, advanced strainers for water treatment, and clarifying units to allow us to reuse more of our process water, to reduce our draw on water resources. In addition, we have implemented a structured water monitoring system to help us isolate and find additional water conservation opportunities. No anticipated changes in trending are noted.

Facility reference number

Facility 6

Facility name

Santa Clara Mill

% recycled or reused

Not monitored

Comparison with previous reporting year

About the same

Please explain

Water is critical to papermaking and is responsibly returned to the environment. We invest in technologies, like water tanks, advanced strainers, and clarifying units. We have implemented a water monitoring system to isolate water conservation opportunities. We note that the Santa Clara Mill has been closed as of December 2017 and as such will not have any water withdrawal, discharge, consumption, recycling volumes or monitoring activities associated with this mill in the coming years.

Facility reference number

Facility 7

Facility name

East Angus Mill

% recycled or reused

Not monitored

Comparison with previous reporting year

About the same

Please explain

Water is critical to papermaking, and the water we borrow from the environment is responsibly returned. We continue to invest in technologies, like water tanks, advanced strainers for water treatment, and clarifying units to allow us to reuse more of our process water, to reduce our draw on water resources. In addition, we have implemented a structured water monitoring system to help us isolate and find additional water conservation opportunities. No anticipated changes in trending are noted.

(W5.1d) For the facilities referenced in W5.1, what proportion of water accounting data has been externally verified?

Water withdrawals – total volumes

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

Water withdrawals – volume by source

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

Water withdrawals – quality

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

Water discharges – total volumes

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

Water discharges – volume by destination

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

Water discharges – volume by treatment method

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

Water discharge quality – quality by standard effluent parameters

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

Water discharge quality – temperature

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

Water consumption – total volume

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

Water recycled/reused

% verified
Not verified

What standard and methodology was used?
Water data was generated from invoices and on site meters. GPI is reviewing 3rd party partners to verify the data.

W6. Governance

W6.1

(W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

W6.1a

(W6.1a) Select the options that best describe the scope and content of your water policy.

| | Scope | Content | Please explain |
|-------|--|---|--|
| Row 1 | Select facilities, businesses, or geographies only | Description of water-related performance standards for direct operations Commitment to stakeholder awareness and education | Due to the high level of water use in our mills GPI has prioritized our water strategy in these facilities. Our water policy comprises the communications of our commitments to water stewardship for which we set water effluent and overarching water monitoring goals, which are disclosed on our corporate website included within our Sustainability Vision 2025 Goals. |

W6.2

(W6.2) Is there board level oversight of water-related issues within your organization?

Yes

W6.2a

(W6.2a) Identify the position(s) of the individual(s) on the board with responsibility for water-related issues.

| Position of individual | Please explain |
|------------------------|--|
| Other C-Suite Officer | The individual on the leadership team with responsibility to reporting to the Board of Directors for water-related issues is the Executive Vice President, General Counsel and Secretary . This position has the highest level of responsibility towards water-related activities, with direct oversight of the Health, Safety, and Environmental Steering Committee, which meets every 60 days. This position regularly provides HS&E highlights to the Board and also presents an annual compliance and corporate governance report addressing significant developments. Responsibility for water-related issues have been assigned to this position because it has indirect and direct oversight of the VP of Health Safety and Environmental as well as the VP of Sustainability, who maintain direct management of these areas. |

W6.2b

(W6.2b) Provide further details on the board's oversight of water-related issues.

| | Frequency that water-related issues are a scheduled agenda item | Governance mechanisms into which water-related issues are integrated | Please explain |
|-------|---|--|---|
| Row 1 | Scheduled - some meetings | Reviewing and guiding business plans Reviewing and guiding risk management policies Reviewing and guiding strategy | Approximately every 2 months the Health, Safety & Environment committee meetings are held, at which safety, water-related risks, CapEx projects, and other related topics are discussed as appropriate. Goal trending are discussed. A summary is presented for review by the Board of Directors. This informs the board's assessment of risk management policies and strategy related to GPI's water use as a key resource to our operations. Annually, long-term business objectives and goals are reviewed by the Board in conjunction with the presentation of changes to water reduction and crisis plans. |

W6.3

(W6.3) Below board level, provide the highest-level management position(s) or committee(s) with responsibility for water-related issues.

Name of the position(s) and/or committee(s)

Other committee, please specify

Responsibility

Both assessing and managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

More frequently than quarterly

Please explain

The HS&E Steering Committee, which includes representatives from Sustainability/ Social Responsibility, HS&E, Operations, Legal, Human Resources and Risk Management, receives and reviews reports from the Vice President of Government Affairs and Sustainability and the Vice President of Health, Safety and Environmental. This committee also reviews risk policies and insurance and meets approximately every 2 months. Overall responsibility for our sustainability and social responsibility strategy is with our executive leadership team. The Vice President of Government Affairs and Sustainability provides the strategic direction. This individual is a member of the extended executive leadership team and reports regularly on key programs to the President and CEO, and also to our Board of Directors every 60 days.

Name of the position(s) and/or committee(s)

Environment/Sustainability manager

Responsibility

Both assessing and managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

More frequently than quarterly

Please explain

The HS&E Steering Committee, which includes representatives from Sustainability/ Social Responsibility, HS&E, Operations, Legal, Human Resources and Risk Management, receives and reviews reports from the Vice President of Government Affairs and Sustainability and the Vice President of Health, Safety and Environmental. This committee also reviews risk policies and insurance and meets every 60 days. Overall responsibility for our sustainability and social responsibility strategy is with our executive leadership team. The Vice President of Government Affairs and Sustainability provides the strategic direction. This individual is a member of the extended executive leadership team and reports regularly on key programs to the President and CEO, and also to our Board of Directors approximately every 2 months.

W6.5

(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?

Yes, direct engagement with policy makers

W6.5a

(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?

Along with communicating our sustainability and responsibility programs, we share the impacts of legislation and regulation on operations and our ability to execute these programs. Engagements with these groups include one-on-one meetings, facility tours and town hall meetings. For example, when there is legislation, which GPI considers significant to our operations or community, we meet with legislators and review concerns for the bill or proposed regulation and highlight alternatives. Additionally, we participate in public comment periods representing GPI or as a member of an industry association in order to provide relevant feedback as the opportunities for federal engagement arise.

W7. Business strategy

W7.1

(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

| | Are water-related issues integrated? | Long-term time horizon (years) | Please explain |
|---|--|--------------------------------|---|
| Long-term business objectives | Yes, water-related issues are integrated | 5-10 | The stewardship of our water resources along with our operational water efficiency are integrated into our long-term business objectives. Customers of food and beverage products have expressed concerns with plastic packaging due to pollution concerns and as such, are placing a greater interest on paperboard, GPI is taking concerted efforts and reflecting on how our resource use and operational processes are perceived by the market. GPI is monitoring technologies associated with reducing water use on a continual basis and will implement those that have relevance to mill situations and are economically justifiable in the context of meeting our water use and monitoring commitments that have been incorporated into our Sustainability Vision 2025 goals. The time horizon selected aligns with the period for which each goal noted above is targeted for 2025 and are reviewed against a 2016 baseline. GPI acknowledges that our near-term projects will have long-term impacts, however at this time, we have no formal long-term targets in excess of 10 years, as forecasting beyond 5 years can be highly speculative. |
| Strategy for achieving long-term objectives | Yes, water-related issues are integrated | 5-10 | Water use practices are embedded into GPI's strategy for achieving long-term objectives, both in terms of the water-specific effluent and monitoring goals set as well as the energy and GHG reduction targets. By incorporating improved water reuse recovery and recycling efforts into our operations, our water withdrawals, discharges, energy use, emissions and energy costs all decline associated with the act of using less water maintained at a higher temperature for optimal fiber processing. This is key to GPI's strategy to maintain a low cost operating structure. The time horizon selected aligns with the period for which each goal noted above is targeted for 2025 and are reviewed against a 2016 baseline. |
| Financial planning | Yes, water-related issues are integrated | 5-10 | Water related issues are indirectly integrated into GPI's financial planning process in which GPI anticipates positive revenue growth associated with a shift in customer preferences and innovation. This is tied to the shift observed in customer concerns attributed to plastic packaging and industry trends switching to paperboard alternatives. This market shift along with GPI's low cost structure, which supports water and energy efficient practices will have direct financial impacts on both the revenue and expense financial statement line items respectively. As the operational efficiency goals are tied to a 5-10 year horizon, it is expected that the financial effects associated with these projects would occur in conjunction. |

W7.2

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

| | Water-related CAPEX (+/- % change) | Anticipated forward trend for CAPEX (+/- % change) | Water-related OPEX (+/- % change) | Anticipated forward trend for OPEX (+/- % change) | Please explain |
|-------|------------------------------------|--|-----------------------------------|---|--|
| Row 1 | 0 | 0 | 0 | 0 | Capital and operational expenses are monitored, however they have remained the same compared to the previous reporting year. Water use is monitored in our Mills on a monthly frequency, in which usage reports are generated and distributed to key leaders at which time, risks and any water-related capital and operational expenses are also reviewed. Water reduction and crisis plans are developed, as appropriate, annually with long term goals established and monitored. |

W7.3

(W7.3) Does your organization use climate-related scenario analysis to inform its business strategy?

| | Use of climate-related scenario analysis | Comment |
|-------|--|---------|
| Row 1 | No, but we anticipate doing so within the next two years | |

W7.4

(W7.4) Does your company use an internal price on water?

Row 1

Does your company use an internal price on water?

No, and we do not anticipate doing so within the next two years

Please explain

GPI does not anticipate integrating water valuation practices into our operations within the next two years as we are prioritizing engagement with our direct operations as we work toward the Sustainability Vision 2025 operational goals.

W8. Targets

W8.1

(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.

| | Levels for targets and/or goals | Monitoring at corporate level | Approach to setting and monitoring targets and/or goals |
|-------|---------------------------------|--|---|
| Row 1 | Company-wide targets and goals | Targets are monitored at the corporate level Goals are monitored at the corporate level | Water is critical to papermaking, and the water we borrow from the environment is responsibly returned. We continue to invest in technologies, like water tanks, advanced strainers for water treatment, and clarifying units to allow us to reuse more of our process water, to reduce our draw on water resources. In addition, we have implemented a structured water monitoring system to help us isolate and find additional water conservation opportunities. GPI identifies targets and goals relevant to our specific water risks. GPI monitors our effluent on a monthly basis consistent with prior reporting periods. Additionally, the mill division establishes goals each year and monitors progress of activity toward achieving those goals against the baseline period. Formally GPI has set company-wide targets and goals in support of our organization's overall commitment to preserve the environment, which drives strategic development within our organization and traction toward our goals. |

W8.1a

(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.

Target reference number

Target 1

Category of target

Water discharge

Level

Company-wide

Primary motivation

Water stewardship

Description of target

10% reduction in effluent by 2025 from a base year of 2016

Quantitative metric

% reduction per unit of production

Baseline year

2016

Start year

2016

Target year

2025

% achieved

0

Please explain

GPI notes that water discharge increased approximately 1.2% Y-o-Y on an absolute basis and down -2.3% Y-o-Y per ton of paperboard produced on an intensity basis. The increase in water discharge is not currently in alignment with the established target. This target has not been revised.

Target reference number

Target 2

Category of target

Monitoring of water use

Level

Company-wide

Primary motivation

Recommended sector best practice

Description of target

100% of locations reporting water by 2025. Currently 100% of Mills report water which represents a significant amount of water for the company

Quantitative metric

% sites monitoring water discharge total volumes

Baseline year

2016

Start year

2016

Target year

2025

% achieved

7.95

Please explain

GPI notes that the quantitative disclosure of our reporting water facilities remains at 7.95% or 7 mills of our 88 total sites, which represent over 90% of GPI's water usage, however we plan to include water withdrawal, distribution, and consumption from conversion-paper mill facilities in prospective quantitative water use analyses and disclosures. This target has not been revised.

W8.1b

(W8.1b) Provide details of your water goal(s) that are monitored at the corporate level and the progress made.

Goal

Engagement with public policy makers to advance sustainable water management and policies

Level

Company-wide

Motivation

Shared value

Description of goal

Ensure that the Waters of the US legislation was achievable in its intent to improve water quality. Ensure that water policy and regulation in Oregon would achieve its intent to improve water quality

Baseline year

2016

Start year

2016

End year

2025

Progress

Both bills are in process and feedback has been provided and are monitored on an ongoing basis. Progress indicators are represented by each milestone in the legislative process, in which success is dependent on how intact the bill remains at the conclusion of each legislative milestone in regard to those stipulations for which GPI is supporting.

W9. Linkages and trade-offs

W9.1

(W9.1) Has your organization identified any linkages or tradeoffs between water and other environmental issues in its direct operations and/or other parts of its value chain?

Yes

W9.1a

(W9.1a) Describe the linkages or tradeoffs and the related management policy or action.

Linkage or tradeoff

Linkage

Type of linkage/tradeoff

Increased energy efficiency

Description of linkage/tradeoff

Due to GPI's reliance on water as a critical resource, the reuse of water in our operations limits withdrawal and maintains an overall higher temperature for which less energy is required to heat the water to the process temperature to breakdown the paperboard. As such, water efficiency measures have a direct linkage toward increasing energy efficiency thereby also limiting any associated GHG emissions.

Policy or action

Water is critical to papermaking, and the water we borrow from the environment is responsibly returned. We continue to invest in technologies, like water tanks, advanced strainers for water treatment, and clarifying units to allow us to reuse more of our process water, to reduce our draw on water resources. In addition, we have implemented a structured water monitoring system to help us isolate and find additional water conservation opportunities.

W10. Verification

W10.1

(W10.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1d)?

No, we do not currently verify any other water information reported in our CDP disclosure

W11. Sign off

W-FI

(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

N/A

W11.1

(W11.1) Provide details for the person that has signed off (approved) your CDP water response.

| | Job title | Corresponding job category |
|-------|-----------------------------------|----------------------------|
| Row 1 | EVP General Counsel and Secretary | Other C-Suite Officer |

W11.2

(W11.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].

No

SW. Supply chain module

SW0.1

(SW0.1) What is your organization's annual revenue for the reporting period?

| | Annual revenue |
|-------|----------------|
| Row 1 | 4400000000 |

SW0.2

(SW0.2) Do you have an ISIN for your organization that you are willing to share with CDP?

Yes

SW0.2a

(SW0.2a) Please share your ISIN in the table below.

| | ISIN country code | ISIN numeric identifier (including single check digit) |
|-------|-------------------|--|
| Row 1 | US | 3886891015 |

SW1.1

(SW1.1) Have you identified if any of your facilities reported in W5.1 could have an impact on a requesting CDP supply chain member?

This is confidential

SW1.2

(SW1.2) Are you able to provide geolocation data for your site facilities not already reported in W5.1?

No, this is confidential data

SW2.1

(SW2.1) Please propose any mutually beneficial water-related projects you could collaborate on with specific CDP supply chain members.

SW2.2

(SW2.2) Have any water projects been implemented due to CDP supply chain member engagement?

No

SW3.1

(SW3.1) Provide any available water intensity values for your organization's products or services across its operations.

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

| | Public or Non-Public Submission | I am submitting to | Are you ready to submit the additional Supply Chain Questions? |
|-----------------------------|---------------------------------|------------------------|--|
| I am submitting my response | Public | Investors Customers | Yes, submit Supply Chain Questions now |

Please confirm below

I have read and accept the applicable Terms