

F0. Introduction

F0.1

**(F0.1) 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](http://www.graphicpkg.com)

Cautionary Statement: 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.

F0.2

**(F0.2) 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

F0.3

**(F0.3) Select the currency used for all financial information disclosed throughout your response.**

USD

F0.4

**(F0.4) Select the stage(s) of the value chain which best represents your organization's area of operation pertaining to forest risk commodities.**

Processing  
Manufacturing

F0.5

**(F0.5) Do you produce, use, or sell materials or products that contain any of the forest risk commodities?**

	Produce/use/sell	Disclosing	Explanation if produce/use/sell but not disclosing
Timber	Yes	Yes	<Not Applicable>
Palm Oil	<Not Applicable>	<Not Applicable>	<Not Applicable>
Cattle Products	<Not Applicable>	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other	No	<Not Applicable>	<Not Applicable>

F0.6

**(F0.6) Are there any parts of your direct operations not included in your disclosure?**

Yes

## F0.6a

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### (F0.6a) Identify the parts of your direct operations not included in your disclosure.

#### Exclusion

Source/country/geographical area

#### Description of exclusion

Graphic Packaging is disclosing our Paperboard Mills in North America. These mills represent purchases of wood - fiber from virgin and recycled sources. Graphic Packaging mills provide most of the paperboard that our global converting plants manufacture into paperboard cartons. Graphic Packaging is not disclosing information about paperboard that is not manufactured by Graphic Packaging, but is manufactured by other paperboard manufacturers globally. This represents our global folding converting locations in the Americas, Europe, Asia and Australia. Purchased virgin paperboard for our North America converting locations is audited by SFI under the certified sourcing scheme.

#### Potential for forests-related risk

Potential for forests-related risk but not evaluated

#### Please explain

Paperboard sourced from other paperboard mills, than Graphic Packaging, do rely on forest resources. Graphic Packaging has not requested that these suppliers provide data to the CDP. Purchased virgin paperboard for our North America converting locations is audited by SFI under the certified sourcing scheme.

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## F0.7

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### (F0.7) Are there any parts of your supply chain not included in your disclosure?

Yes

## F0.7a

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### (F0.7a) Identify the parts of your supply chain not included in your disclosure.

#### Exclusion

Source/ country/ geographical area

#### Description of exclusion

Paperboard supplied by paperboard manufacturers other than Graphic Packaging to our Europe, Asia, Australia and Brazil are not being reported..

#### Potential for forests-related risk

Potential for forests-related risk but not evaluated

#### Please explain

Graphic Packaging is disclosing our Paperboard Mills in North America. These mills represent purchases of wood - fiber from virgin and recycled sources. Graphic Packaging mills provide most of the paperboard that our global converting plants manufacture into paperboard cartons. Graphic Packaging is not disclosing information about paperboard that is not manufactured by Graphic Packaging, but is manufactured by other paperboard manufacturers globally. This represents our global folding converting locations in the Americas, Europe, Asia and Australia. Purchased virgin paperboard for our North America converting locations is audited by SFI under the certified sourcing scheme.

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## F1. Current state

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## F1.1

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**(F1.1) How does your organization produce, use, or sell your disclosed commodity(ies)?**

**Forest risk commodity**

Timber

**Activity**

Using as input into product manufacturing

**Form of commodity**

Softwood logs  
Sawn timber, veneer, chips  
Primary packaging

**Source**

Owned/managed land  
Smallholders  
Multiple contracted producers  
Contracted suppliers (manufacturers)

**Country/Region of origin**

United States of America

**% of procurement spend**

6-10%

**Comment**

Graphic Packaging purchases Pine logs and pine chips to service our mills in Macon, GA and Monroe, LA. The company also purchases paperboard to convert into cartons from North American suppliers for the North American market. The paperboard supplied from external paperboard mills is compliant with SFI Certified Sourcing. Percent of procurement is related to the companies North American spend.

**Forest risk commodity**

Timber

**Activity**

Using as input into manufacturing process for power generation

**Form of commodity**

Wood-based bioenergy

**Source**

Owned/managed land  
Smallholders  
Multiple contracted producers

**Country/Region of origin**

United States of America

**% of procurement spend**

<1%

**Comment**

Residuals from the harvesting of pine logs, including branches and bark are used in energy production.

**F1.2**

**(F1.2) Indicate the percentage of your organization's revenue that was dependent on your disclosed forest risk commodity(ies) in the reporting year.**

	<b>% of revenue dependent on commodity</b>	<b>Comment</b>
Timber	61-70%	Represents the production of virgin paperboard sold as paperboard or converted into paperboard packaging.
Palm Oil	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other	<Not Applicable>	<Not Applicable>

**F1.3**

**(F1.3) Do you own or manage land used for the production of your disclosed commodity(ies)?**

**Forest risk commodity**

Timber

**Own and/or manage land?**

Don't own or manage land

**Type of control**

<Not Applicable>

**Description of type of control**

<Not Applicable>

**Country/Region**

<Not Applicable>

**Land type**

<Not Applicable>

**Size (Hectares)**

<Not Applicable>

**Do you have a system in place to monitor forests-related risks?**

<Not Applicable>

**Type of monitoring system**

<Not Applicable>

**Description of monitoring system**

<Not Applicable>

**Recent infraction(s)**

<Not Applicable>

**Explanation of infraction**

<Not Applicable>

**F1.5**

**(F1.5) Does your organization collect production and/or consumption data for your disclosed commodity(ies)?**

	Data availability/Disclosure
Timber	Production data available, disclosing
Palm Oil	<Not Applicable>
Cattle products	<Not Applicable>
Soy	<Not Applicable>
Other - Rubber	<Not Applicable>
Other	<Not Applicable>

**F1.5a**

**(F1.5a) Disclose your production and/or consumption data.**

**Forest risk commodity**

Timber

**Data type**

Production data

**Volume**

1355000

**Metric**

Metric tons

**Data coverage**

Partial commodity production/consumption

**Please explain**

Production of paperboard manufactured at Graphic Packaging virgin mills is disclosed on our 10-k. Graphic Packaging does not report on the bio mass consumption used for energy.

**F1.6**

**(F1.6) Have you identified sufficient sources of sustainable materials to meet your current operational needs? If yes, what are you doing to ensure the security/continuity of this supply?**

**Timber**

**Sustainable source identified**

Yes

**Primary action to ensure supply**

Other, please specify (Mapping and supplier diversification)

**Please explain**

Graphic Packaging has a comprehensive program to ensure sustainable forest management. We engage with our wood suppliers on sustainable forest management and we are compliant with FSC/SFI/PEFC forest / fiber certification schemes

F1.7

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**(F1.7) Has your organization experienced any detrimental forests-related impacts?**

No

F2. Procedures

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F2.1

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**(F2.1) Does your organization undertake a forests-related risk assessment?**

Yes, forests-related risks are assessed

F2.1a

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**(F2.1a) Select the options that best describe your procedures for identifying and assessing forests-related risks.**

**Timber**

**Value chain stage**

Supply chain

**Coverage**

Full

**Risk assessment procedure**

Assessed as a standalone issue

**Frequency of assessment**

Annually

**How far into the future are risks considered?**

1 to 3 years

**Tools and methods used to identify and assess risks**

Internal company methods

**Please explain**

Graphic Packaging complies with the FSC, SFI and PEFC Chain of Custody standards. The procedures that Graphic Packaging has created to comply with the standards requires a risk assessment. The forest risk assessment is conducted on annual basis. In addition there is a risk assessment conducted within our purchasing process.

F2.1b

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**(F2.1b) Which of the following issues are considered in your organization's forests-related risk assessment(s)?**

**Availability of forest risk commodities**

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process.

**Quality of forest risk commodities**

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process.

**Impact of activity on the status of ecosystems and habitats**

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process.

**Regulation**

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process.

**Climate change**

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process.

**Tariffs or price increases**

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process.

**Loss of markets**

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process.

**Brand damage related to forest risk commodities**

**Relevance & inclusion**

Not considered

**Please explain**

Graphic Packaging does not assess brand damage related to forest risk commodities.

**Corruption**

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process. The purchasing process requires that our suppliers agree to our expectations for fair and ethical business practices.

**Social impacts**

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process. The purchasing process requires that our suppliers agree to our expectations for fair and ethical business practices.

**Other, please specify**

**Relevance & inclusion**

Please select

**Please explain**

## F2.1c

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### (F2.1c) Which of the following stakeholders are considered in your organization's forests-related risk assessments?

#### Customers

**Relevance & inclusion**

Relevant, always included

**Please explain**

Customer purchase requirements and the impact on our ability to supply these requirements are assessed in our strategic planning.

#### Employees

**Relevance & inclusion**

Relevant, not included

**Please explain**

Our employees (primarily our wood procurement team) are experienced and understand forest management and the local supply. We don't anticipate that they present additional risk.

#### Investors

**Relevance & inclusion**

Not considered

**Please explain**

Our investors expect that Graphic Packaging is appropriately managing our wood basket.

#### Local communities

**Relevance & inclusion**

Relevant, not included

**Please explain**

Graphic Packaging respects that we are a vital member of the community and we have an open and on-going dialog with our community stakeholders. Risks due to forest management is low as there is an abundance of forests resources in our virgin mill wood baskets.

#### NGOs

**Relevance & inclusion**

Relevant, sometimes included

**Please explain**

Graphic Packaging meets with NGOs that specialize on forest management to assess our program. In 2017 The Forest Trust assessed our program and provided feedback.

#### Other forest risk commodity users/producers at a local level

**Relevance & inclusion**

Please select

**Please explain**

#### Regulators

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process. Regulation, if appropriate is a consideration that is assessed.

#### Suppliers

**Relevance & inclusion**

Relevant, always included

**Please explain**

A risk assessment is conducted by each virgin mill, Monroe, LA and Macon, GA. The assessment is a part of our CoC and purchasing process. The purchasing process requires that our suppliers agree to our expectations for fair and ethical business practices.

#### Other stakeholders, please specify

**Relevance & inclusion**

Not considered

**Please explain**

## F3. Risks and opportunities

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### F3.1

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**(F3.1) Have you identified any inherent forests-related risks with the potential to have a substantive financial or strategic impact on your business?**

	Risk
Timber	No
Palm Oil	<Not Applicable>
Cattle Products	<Not Applicable>
Soy	<Not Applicable>
Other - Rubber	<Not Applicable>
Other	<Not Applicable>

**F3.1a**

**(F3.1a) How does your organization define substantive impact on your business?**

Graphic Packaging does not expect that forest related risks will be material in nature. Graphic Packaging follows the rules of the SEC with respect to disclosure of material risks to its business.

**F3.1c**

**(F3.1c) Why does your organization not consider itself to be exposed to forests-related risks with the potential to have a substantive financial or strategic impact?**

**Forest risk commodities**

Timber

**Primary reason for not identifying risks**

Risks exist, but no substantive impact anticipated

**Please explain**

Graphic Packaging's mills operate in the SE United States, where we purchase wood from large and small landowners. Deforestation is low risk in this region as there is a robust supply of timber where harvest is less than growth. Risks that could occur, and present no substantive risk would be short term in nature, like significant rainfall that reduces wood harvest as loggers are not able to operate in the forest.

**F3.2**

**(F3.2) Have you identified any forests-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

	Have you identified opportunities?
Timber	Yes
Palm Oil	<Not Applicable>
Cattle products	<Not Applicable>
Soy	<Not Applicable>
Other - Rubber	<Not Applicable>
Other	<Not Applicable>

**F3.2a**

**(F3.2a) For your selected forest risk commodity(ies), provide details of the identified opportunities with the potential to have a substantive financial or strategic impact on your business.**

**Forest risk commodity**

Timber

**Type of opportunity**

Products & services

**Where in your value chain does the opportunity occur?**

Direct operation

**Primary forests-related opportunity**

Increased brand value

**Financial incentives**

<Not Applicable>

**Company-specific description & strategy to realize opportunity**

Market the environmental benefits of paperboard packaging. It is made from a renewable material and is recyclable.

**Estimated timeframe for realization**

1-3 years

**Magnitude of potential impact**

Unknown

**Likelihood**

Likely

**Potential financial impact**

**Explanation of financial impact**

Graphic Packaging has focused our product portfolio on paperboard packaging that is made from kraft virgin fibers and recycled paper. These paperboard products are made from a renewable material and can be recycled. Graphic Packaging promotes these paper/paperboard packaging products by communicating the recycling and renewable aspects of the fiber and through outreach programs to improve understanding of life cycle of paper products and the recyclable of paper/paperboard.

**F4. Governance**

**F4.1**

**(F4.1) Does your organization have a policy that includes forests-related issues?**

Yes, we have a documented forests policy, but it is not publicly available

**F4.1a**

**(F4.1a) Select the options to describe the scope and content of your policy.**

	Scope	Content	Please explain
Row 1	Company-wide	Commitment to avoiding deforestation and forest degradation Commitment to protect rights and livelihoods of local communities Commitment to transparency Commitment to stakeholder awareness and education Commitment to innovation Commitment to align with public policy initiatives, e.g. SDGs Recognition of the overall importance of forests and other natural habitats List of timebound commitments and targets Description of forests-related standards for procurement Reference to international standards and widely-recognized forests-related initiatives	Graphic Packaging has documented policy that is communicated internally and is posted to our internal website. Further it is communicated to external stakeholders upon request.

**F4.1b**

**(F4.1b) Do you have commodity specific sustainability policy(ies)? If yes, select the options that best describe their scope and content.**

	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain
Timber	Yes	Company-wide	Commitment to avoiding deforestation and forest degradation Commitment to protect rights and livelihoods of local communities Commitment to transparency Commitment to stakeholder awareness and education Commitment to innovation Commitment to align with public policy initiatives, e.g. SDGs Recognition of the overall importance of forests and other natural habitats List of timebound commitments and targets Description of forests-related standards for procurement Reference to international standards and widely-recognized forests-related initiatives	Graphic Packaging has documented policy that is communicated internally and is posted to our internal website. Further it is communicated to external stakeholders upon request.
Palm Oil	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Cattle Products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

**F4.2**

**(F4.2) Is there board-level oversight of forests-related issues within your organization?**

No

**F4.2c**

**(F4.2c) Why is there no board-level oversight of forests-related issues and what are your plans to change this in the future?**

	Primary reason	Board level oversight of forests-related issues will be introduced in the next two years	Please explain
Row 1	The Graphic Packaging Board sets expectations for the company and has placed responsibility for forest / fiber related oversight with the Graphic Packaging leadership team.	No	Our Board of Directors sets expectations from the top in terms of demonstrating our culture and guiding our purpose, values and strategy in relation to climate-change and forest / fiber management. As set forth in our Corporate Governance Guidelines, our Board is responsible for reviewing, approving and monitoring business strategies and financial performance, and ensuring processes are in place for maintaining the integrity of the company in financial reporting, legal and ethical compliance matters, and in relationships with customers, suppliers, employees, the community and stockholders. The Board fulfills these responsibilities through a number of different practices, including the approval of each annual operating plan and strategic long-range plan, the review of actual results against such plans at each regular Board meeting, and specific review and approval of significant corporate actions such as acquisitions and divestitures, plant rationalizations and major projects involving significant capital spending. The Board currently has three separately-designated standing committees: the Audit Committee, the Compensation and Benefits Committee and the Nominating and Corporate Governance Committee. The Board is updated on a regular basis on any Forest / Fiber related concerns as appropriate.

**F4.3**

**(F4.3) Below board level, provide the highest-level management position(s) or committee(s) with responsibility for forests-related issues.**

Name of the position(s) and/or committee(s)	Responsibility	Frequency of reporting to the board on forests-related issues	Please explain
Business unit manager	Both assessing and managing forests-related risks and opportunities	Annually	The responsibility for forest related issues is a team approach at Graphic Packaging. The primary leader for the team is the SVP of Supply Chain as that role is directly responsible in securing an appropriate quantity of wood for operations. The team consists of the procurement team, including wood procurement. Complementing the team is the sustainability leader and sustainability team members.

F4.4

**(F4.4) Do you provide incentives to C-suite employees or board members for the management of forests-related issues?**

No, and we do not plan to introduce them in the next two years

F5. Business strategy

F5.1

**(F5.1) Are forests-related issues integrated into any aspects of your long-term strategic business plan, and if so how?**

	Are forests-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, forests-related issues are integrated	5-10	At Graphic Packaging, we utilize a strategic planning process that helps shape our overall business objectives and strategy. As part of this annual process, forest related risks and opportunities are also taken into consideration. Our long-range plan assesses forest related risks and opportunities over a five-year time horizon with specific financial modeling over the initial three years. As part of our long-range planning, we seek to take the following into consideration as well as integrate into our overall strategic business objectives: o Market-related concerns such as quality and quantity of raw material sources o Utilization of renewable materials o Adherence to compliance-related certification programs o Capital investment opportunities for both operations and logistics Preparing for our long-range planning process, our assessment of forest related risks and opportunities have focused on macro influencers on our wood basket. We wood in our production processes and we have sought to understand potential changes in supply and demand based on climate-related events or other reactions related to climate-change by working with an external party to model scenarios. For example, to accomplish the UK's carbon reduction goals, many utilities have transitioned to generated electricity from coal to biomass sources. Certain utilities have started to source wood from the United States which also impacts the overall supply of this raw material.
Strategy for long-term objectives	Yes, forests-related issues are integrated	5-10	At Graphic Packaging, we utilize a strategic planning process that helps shape our overall business objectives and strategy. As part of this annual process, forest related risks and opportunities are also taken into consideration. Our long-range plan assesses forest related risks and opportunities over a five-year time horizon with specific financial modeling over the initial three years. As part of our long-range planning, we seek to take the following into consideration as well as integrate into our overall strategic business objectives: o Market-related concerns such as quality and quantity of raw material sources o Utilization of renewable materials o Adherence to compliance-related certification programs o Capital investment opportunities for both operations and logistics Preparing for our long-range planning process, our assessment of forest related risks and opportunities have focused on macro influencers on our wood basket. We wood in our production processes and we have sought to understand potential changes in supply and demand based on climate-related events or other reactions related to climate-change by working with an external party to model scenarios. For example, to accomplish the UK's carbon reduction goals, many utilities have transitioned to generated electricity from coal to biomass sources. Certain utilities have started to source wood from the United States which also impacts the overall supply of this raw material.
Financial planning	Yes, forests-related issues are integrated	5-10	At Graphic Packaging, we utilize a strategic planning process that helps shape our overall business objectives and strategy. As part of this annual process, forest related risks and opportunities are also taken into consideration. Our long-range plan assesses forest related risks and opportunities over a five-year time horizon with specific financial modeling over the initial three years. As part of our long-range planning, we seek to take the following into consideration as well as integrate into our overall strategic business objectives: o Market-related concerns such as quality and quantity of raw material sources o Utilization of renewable materials o Adherence to compliance-related certification programs o Capital investment opportunities for both operations and logistics Preparing for our long-range planning process, our assessment of forest related risks and opportunities have focused on macro influencers on our wood basket. We wood in our production processes and we have sought to understand potential changes in supply and demand based on climate-related events or other reactions related to climate-change by working with an external party to model scenarios. For example, to accomplish the UK's carbon reduction goals, many utilities have transitioned to generated electricity from coal to biomass sources. Certain utilities have started to source wood from the United States which also impacts the overall supply of this raw material.

F6. Implementation

F6.1

**(F6.1) Has your organization made a public commitment to reduce or remove deforestation and/or forest degradation from its direct operations and/or supply chain?**

Yes

F6.1a

**(F6.1a) Has your organization endorsed any of the following initiatives as part of its public commitment to reduce or remove deforestation and/or forest degradation?**

Please select

F6.1b

**(F6.1b) Provide details on your public commitment(s), including the description of specific criteria, coverage, and actions.**

**Commodity coverage**

Timber

**Criteria**

No conversion of natural habitats  
Zero net deforestation and forest degradation  
No new development on peatland  
Avoidance of negative impacts on threatened and protected species and habitats  
Resolution of complaints and conflicts through an open, transparent and consultative process  
Facilitate the inclusion of smallholders into the supply chain  
No sourcing of illegally produced and/or traded forest risk commodities  
No sourcing of forest risk commodities from unknown/controversial sources

**Operational coverage**

Direct operations and supply chain

**% of total production/ consumption covered by commitment**

100%

**Commitment timeframe**

2017

**Please explain**

Graphic Packaging is committed to the goals of sustainable forestry and promoting responsible resource management and use. Our Policy is to implement and achieve the Principles of Sustainable Forestry including environmentally, socially and economically sustainable practices to meet the needs of the present without compromising the ability of future generations to meet their needs. This is accomplished by practicing and promoting a resource and conservation stewardship ethic. We implement best efforts to avoid trading in wood or wood fiber that is: a) illegally harvested, b) harvested in violation of traditional and civil rights, c) harvested where global conservation priorities are threatened, d) harvested in natural forests undergoing significant conversion to plantations or non-forest uses, and e) from forests in which genetically modified trees are planted. In 2010, we initiated the industry's most ambitious forest management and fiber sourcing program -- the Tri-Certification Chain of Custody (COC). Each year representatives of SFI, FSC and PEFC audit our kraft virgin fiber management processes to ensure we are compliant with their standards. Our COC program assures we can trace wood fiber through our manufacturing process. Management of recycled fiber is also vital. In 2013, we were awarded a certificate from the Recycled Paper Alliance certifying the content of our recycled paperboard and cartons. To achieve goals and support rural communities we have developed and adopted appropriate programs and documented procedures to guide our wood and fiber procurement, production of certified products and associated environmental claims and labels. A hallmark of our support is our landowner and logger outreach program where we provide facilitate training on forest management practices. Graphic Packaging has made tremendous progress in responsible forest and fiber management. Highlights include: • We support all recognized forest and fiber certification standards including Sustainable Forestry Initiative® (SFI®), the Forest Stewardship Council™ (FSC®), the American Tree Farm System® (ATFS), the Programme for Endorsement of Forest Certification (PEFC™) and the Recycled Paperboard Alliance (RPA-100%). • GPI endorses responsible forestry and requires that our wood suppliers and loggers be trained in sustainable forestry practices.

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**F6.2**

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**(F6.2) Did you have any quantified targets for increasing sustainable production and/or consumption of your disclosed commodity(ies) that were active during the reporting year?**

Yes

**F6.2a**

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**(F6.2a) Provide details of your target(s) for increasing sustainable production and/or consumption of the disclosed commodity(ies), and progress made.**

**Target reference number**

Target 1

**Forest risk commodity**

Timber

**Form of commodity covered**

Softwood log

Sawn timber, veneer, chips

**Type of target**

Third-party certification scheme

**Coverage**

Direct operations

**Traceability point**

<Not Applicable>

**Third-party certification scheme**

FSC Chain of Custody

FSC Controlled Wood

FSC Recycled

PEFC Chain of Custody

SFI Chain of Custody

SFI Fiber Sourcing certification

**Start year**

2016

**Start figure**

71-80%

**Target year**

2025

**Target**

100%

**% achieved**

81-90%

**Please explain**

All Graphic Packaging facilities compliant with a certification standard by 2025.

**F6.3**

**(F6.3) Do you have traceability system(s) in place to track and monitor the origin of your disclosed commodity(ies)?**

	<b>Do you have system(s) in place?</b>
Timber	Yes
Palm Oil	<Not Applicable>
Cattle products	<Not Applicable>
Soy	<Not Applicable>
Other - Rubber	<Not Applicable>
Other	<Not Applicable>

**F6.3a**

**(F6.3a) Provide details on the level of traceability your organization has for your disclosed commodity(ies).**

	% of total production/consumption volume traceable	Point to which commodity is traceable	Description of traceability system	Exclusions	Description of exclusion
Timber	51-60%	Mill	Graphic Packaging is compliant with FSC CW and CoC, SFI Certified Sourcing and CoC and PEFC CoC. Our CoC is from the mill scale through shipment to customers. Our wood suppliers provide information on harvest locations as part of our wood management process.	Facility	Some facilities are not included in our Chain of Custody (CoC) but are under SFI Certified Sourcing in the US, Canada and Winsford.
Palm Oil	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

**F6.4**

**(F6.4) Do you specify any third-party certification schemes for your disclosed commodity(ies)? Indicate the volume and percentage of your production and/or consumption covered.**

**Forest risk commodity**

Timber

**Do you specify any certification scheme?**

Yes

**Third-party certification scheme**

- FSC Chain of Custody
- FSC Controlled Wood
- FSC Recycled
- PEFC Chain of Custody
- SFI Chain of Custody
- SFI Fiber Sourcing certification

**% of total production/consumption volume certified**

100

**Form of commodity**

- Softwood logs
- Primary packaging

**Volume of production/ consumption certified**

2485000

**Metric**

Metric tons

**Please explain**

All Graphic Packaging Paperboard (CUK and CRB) were compliant with FSC, SFI and PEFC in 2017. All CRB paperboard is compliant with the RPA100 certification standard.

**F6.5**

**(F6.5) Do you specify any sustainable production/procurement standards for your disclosed commodity(ies), other than third-party certification? Indicate the percentage of production/consumption covered and if you monitor supplier compliance with these standards.**

**F6.6**

**(F6.6) Are you working with smallholders to encourage and support best practices that aim to reduce or remove deforestation/forest degradation?**

	Are you working with smallholders?	Please explain
Timber	Yes, working with smallholders	Graphic Packaging and the communities that we operate rely on a vibrant forest system. We engage with consultants, the community, suppliers and other stakeholders to ensure that the forest system is managed sustainably. Our engagement with small holders is primarily through loggers and land managers.
Palm Oil	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other	<Not Applicable>	<Not Applicable>

**F6.7**

**(F6.7) Are you working with your direct suppliers to support and improve their capacity to supply sustainable raw materials?**

	Are you working with direct suppliers?	Supplier engagement approach	Please explain
Timber	Yes, working with direct suppliers	Encouraging certification Workshops and training Contractual agreements	Graphic Packaging and the communities that we operate rely on a vibrant forest system. We engage with consultants, the community, suppliers and other stakeholders to ensure that the forest system is managed sustainably. Our engagement with small holders is primarily through loggers and land managers.
Palm Oil	<Not Applicable>	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other	<Not Applicable>	<Not Applicable>	<Not Applicable>

**F6.8**

**(F6.8) Are you working beyond your first-tier supplier(s) to manage and mitigate forests-related risks?**

	Are you working beyond first tier?	Please explain
Timber	Yes, working beyond first tier	Graphic Packaging and the communities that we operate rely on a vibrant forest system. We engage with consultants, the community, suppliers and other stakeholders to ensure that the forest system is managed sustainably. Our engagement with small holders is primarily through loggers and land managers.
Palm Oil	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other	<Not Applicable>	<Not Applicable>

**F6.9**

**(F6.9) Do you participate in external initiatives or activities to further the implementation of your policies concerning the sustainability of your disclosed commodity(ies)?**

**Forest risk commodity**

Timber

**Do you participate in activities/initiatives?**

Yes

**Activities**

Involved in multi-partnership or stakeholder initiatives

**Initiatives**

FSC

PEFC

Sustainable Forestry Initiative (SFI)

**Please explain**

Graphic Packaging is engaged at the Board of Directors and operating level with SFI and engages with FSC through an industry coalition.

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**F-PF6.10**

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**(F-PF6.10) Does your organization have any project(s) focused on reforestation, habitat restoration, or habitat protection that are not part of your production cycle?**

Yes

**F-PF6.10a**

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**(F-PF6.10a) Provide details on your project(s), including the extent, duration, and monitoring frequency. Please specify any measured outcome(s).**

**Project reference**

Project 1

**Project type**

Other, please specify (Trees Into Cartons; Cartons Into Trees)

**Primary motivation**

Voluntary

**Description of project**

Each year Graphic Packaging presents to elementary students on the life cycle of trees and paperboard packaging . Each student receives a tree to plant. Since 2008 the program has planted over 100,000 trees.

**Start year**

2008

**Target year**

Indefinitely

**Projected area to date (Hectares)**

1

**Project area in the target year (Hectares)**

1

**Latitude**

**Longitude**

**Monitoring frequency**

Never

**Measured outcomes to date**

No measured outcomes

**Please explain**

The TICCIT program is a voluntary program that is designed to educate on the value of forests, trees and the interaction with paperboard packaging. The goal is not a volume in reforestation.

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**F7. Linkages and trade-offs**

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**F7.1**

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**(F7.1) Has your organization identified any linkages or trade-offs between forests and other environmental issues in its direct operations and/or other parts of its value chain?**

No

F7.1b

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**(F7.1b) Why has your organization not identified any linkages or trade-offs between forests and other environmental issues?**

	Primary reason	Comment
Row 1	Judged to be unimportant, explanation provided	The predominant forest resource source to Graphic Packaging is managed forest land. Biodiversity is considered in the sustainable management of the forest. In addition, a large portion of forests supporting Graphic Packaging are conversions from food or cotton crop lands.

F8. Verification

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F8.1

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**(F8.1) Do you verify any forests information reported in your CDP disclosure?**

No, we are waiting for more mature verification standards/processes

F9. Barriers and challenges

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F9.1

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**(F9.1) Describe the key barriers or challenges to avoiding forests-related risks in your direct operations or in other parts of your value chain.**

**Forest risk commodity**

Timber

**Coverage**

Supply chain

**Primary barrier/challenge type**

Cost and/or complexity of certification requirements

**Comment**

Forest / Fiber Certification increases cost across the value chain. Currently the value chain has not committed to accept the increased costs. Graphic Packaging understands this and has supplemented certification with sound strategies to ensure sustainable forest / fiber management.

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F9.2

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**(F9.2) Describe the main measures that would improve your organization's ability to manage forests-related risks.**

**Forest risk commodity**

Timber

**Coverage**

Supply chain

Other parts of the value chain

**Main measure**

Greater customer awareness

**Comment**

Graphic Packaging operates its mills in the SE US where there is a robust forest resource system. Greater customer awareness of this fact and that the area is not subject to deforestation would inform them of where to focus attention to reduce deforestation.

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F10. Signoff

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F-FI

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**(F-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.**

F10.1

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(F10.1) Provide the following information for the person that has signed off (approved) your CDP forests response.

	Job Title	Corresponding job category
Row 1	V.P. Gov. Affairs and Sustainability	Environment/Sustainability manager

SF. Supply chain module

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SF0.1

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(SF0.1) What is your organization's annual revenue for the reporting period?

	Annual revenue
Row 1	4404000000

SF0.2

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(SF0.2) Do you have an ISIN for your organization that you are willing to share with CDP?

Yes

SF0.2a

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(SF0.2a) Please share your ISIN in the table below.

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

SF1.1

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(SF1.1) On F6.4 you were asked "Do you specify any third-party certification schemes for your disclosed commodity(ies)? Indicate the volume and percentage of your production and/or consumption covered". Can you also indicate, for each of your disclosed commodity(ies), the percentage of certified volume sold to each requesting CDP supply chain member?

Yes

SF1.1a

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(SF1.1a) For each of your requesting CDP supply chain members, indicate the percentage of certified volume sold per disclosed commodity(ies).

**Requesting member**

Kellogg Company

**Forest risk commodity**

Timber

**Form of commodity**

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Primary packaging

**Third-party certification scheme**

SFI Fiber Sourcing certification

**Total volume of commodity sold to member**

8244

**Metric**

Metric tons

**What % of the volume reported in column 5 is certified?**

100%

**Comment**

---

**Requesting member**

Restaurant Brands International

**Forest risk commodity**

Timber

**Form of commodity**

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Primary packaging

**Third-party certification scheme**

SFI Fiber Sourcing certification

**Total volume of commodity sold to member**

2327

**Metric**

Metric tons

**What % of the volume reported in column 5 is certified?**

100%

**Comment**

---

SF2.1

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(SF2.1) Please propose any mutually beneficial forests-related projects you could collaborate on with specific CDP supply chain members.

**Requesting member**

Kellogg Company

**Commodity related to the project**

Timber

**Category of project**

Communications

**Type of project**

Joint case studies or marketing campaign

**Estimated timeframe for realization of benefits to customer**

1-3 years

**Details of project**

Communicate the impact to small family farms and small holders

**Projected outcome**

Greater awareness of forest / fiber certification for small holders.

**Requesting member**

Restaurant Brands International

**Commodity related to the project**

Timber

**Category of project**

Communications

**Type of project**

Joint case studies or marketing campaign

**Estimated timeframe for realization of benefits to customer**

1-3 years

**Details of project**

Communicate the impact to small family farms and small holders

**Projected outcome**

Greater awareness of forest / fiber certification for small holders.

**Requesting member**

Symrise AG

**Commodity related to the project**

Timber

**Category of project**

Communications

**Type of project**

Joint case studies or marketing campaign

**Estimated timeframe for realization of benefits to customer**

1-3 years

**Details of project**

Communicate the impact to small family farms and small holders

**Projected outcome**

Greater awareness of forest / fiber certification for small holders.

SF2.2

(SF2.2) Have requests or initiatives by CDP supply chain members prompted your organization to take organizational-level action to reduce or remove deforestation/forest degradation from your operations or your supply chain?

No

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