

F0. Introduction

F0.1

(F0.1) Give a general description of and introduction to your organization.

Graphic Packaging Holding Company (together with its subsidiaries, "Graphic Packaging" or the "Company") is committed to providing consumer packaging that makes a world of difference. The Company is a leading provider of paper-based packaging solutions for a wide variety of products to food, beverage, foodservice and other consumer products companies. The Company operates on a global basis, is one of the largest producers of folding cartons in the United States ("U.S.") and holds leading market positions in coated unbleached kraft paperboard ("CUK"), coated-recycled paperboard ("CRB") and solid bleached sulfate paperboard ("SBS"). The Company's customers include many of the world's most widely recognized companies and brands with prominent market positions in beverage, food, foodservice and other consumer products. The Company strives to provide its customers with packaging solutions designed to deliver marketing and performance benefits at a competitive cost by capitalizing on its lowcost paperboard mills and converting plants, its proprietary carton, container and packaging designs, and its commitment to quality and service.

Certain statements regarding the expectations of Graphic Packaging, 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 2018 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 2018	December 31 2018

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.

	Stage of the value chain
Timber	Processing Manufacturing
Palm Oil	<Not Applicable>
Cattle Products	<Not Applicable>
Soy	<Not Applicable>
Other - Rubber	<Not Applicable>
Other	Please select

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

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

Exclusion	Description of exclusion	Potential for forests-related risk	Please explain
Source/ country/ geographical area	Graphic Packaging is disclosing information about 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, evaluated but not disclosing to CDP	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.

F0.7

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

Yes

F0.7a

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

Exclusion	Description of exclusion	Potential for forests-related risk	Please explain
Source/ country/ geographical area	Paperboard supplied by paperboard manufacturers other than Graphic Packaging to our European, Asian, Australian and Brazilian are not being reported. The folding carton converting facilities that utilize this paperboard are compliant with one or several of the three forest and Chain of Custody Certification schemes; (FSC, PEFC and SFI).	Potential for forests-related risk, evaluated, but not disclosing to CDP	Graphic Packaging is disclosing information about 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. The folding carton converting facilities that utilize this paperboard are compliant with one or several of the three forest and Chain of Custody Certification schemes; (FSC, PEFC and SFI).

F1. Current state

F1.1

(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

Hardwood logs
Softwood logs
Primary packaging
Other, please specify (Wood Chips)

Source

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

Country/Region of origin

United States of America

% of procurement spend

11-20%

Comment

Graphic Packaging purchases softwood and hardwood logs and chips to service our mills in Macon and Augusta, GA, Monroe, LA, and Texarkana, TX. The paperboard manufactured by these mills is sold in the external market and used in our global carton manufacturing plants. The company also purchases paperboard to convert into cartons from global paperboard suppliers for all global carton manufacturing plants. The paperboard supplied from external paperboard mills are monitored under our Chain of Custody and Certified Sourcing program. The folding carton converting facilities that utilize this paperboard are compliant with one or several of the three forest and Chain of Custody Certification schemes; (FSC, PEFC and SFI). 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 softwood and hardwood wood sources, 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.

	% of revenue dependent on commodity	Comment
Timber	71-80%	Paperboard and Paperboard cartons represent over 71% of Graphic Packaging's annual revenue.
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?

Owned and managed land

Type of control

Operational

Description of type of control

Graphic Packaging owns less than 2,500 Hectares of forest land near our Texarkanna, TX mill. It is managed and we conduct minimal harvesting activities on it. The forest is not a strategic source of wood for Graphic Packaging.

Country/Region

United States of America

Land type

Planted

Size (Hectares)

2500

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

Yes

Type of monitoring system

Ground-based monitoring system

Description of monitoring system

The land is monitored as part of our wood basket risk assessment process.

Recent infraction(s)

No

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	Consumption 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

Consumption data

Volume

10000000

Metric

Round wood equivalent (RWE)

Data coverage

Full commodity production/consumption

Please explain

Graphic Packaging purchased approximately 10 million tons of wood material in 2018. The wood is primarily in the form of round wood and chips.

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, land owners and loggers on sustainable forest management and we are compliant with FSC/SFI/PEFC forest / fiber certification schemes. We also perform a risk assessment in accordance with our forest / fiber certification program.

F1.7

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

No

F2. Procedures

F2.1

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

Yes, forests-related risks are assessed

F2.1a

(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
FSC Global Forest Registry
National specific tools and databases

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 the is a risk assessment conducted a part of our purchasing process.

F2.1b

(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 to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This 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 to include the wood basket of each virgin paperboard mill, (Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). 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 to include the wood basket of each virgin paperboard mill, (Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). The assessment is a part of our CoC and purchasing process.

Regulation

Relevance & inclusion

Relevant, always included

Please explain

A risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills (Monroe, LA, Texarkana, TX and Macon and Augusta, 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 to include the wood basket of each of Graphic Packaging's virgin paperboard mills (Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of GPI's CoC and purchasing process.

Impact on water security

Relevance & inclusion

Not relevant, explanation provided

Please explain

Graphic Packaging's forest / fiber management practices do not have an impact on the water security in our wood basket.

Tariffs or price increases

Relevance & inclusion

Relevant, always included

Please explain

Graphic Packaging assesses market conditions and government interventions in that marketplace as necessary when developing our long range plan.

Loss of markets

Relevance & inclusion

Relevant, always included

Please explain

A risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills (Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The purchasing process also requires that Graphic Packaging's suppliers agree to its expectations for fair and ethical business practices.

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 to include the wood basket of each of Graphic Packaging's virgin paperboard mills (Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The purchasing process also requires that Graphic Packaging's suppliers agree to its expectations for fair and ethical business practices.

Social impacts

Relevance & inclusion

Relevant, always included

Please explain

A risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills (Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The purchasing process also requires that Graphic Packaging's suppliers agree to its expectations for fair and ethical business practices.

Other, please specify

Relevance & inclusion

Please select

Please explain

F2.1c

(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 Earth Worm (formerly The Forest Trust) assessed our program and provided feedback.

Other forest risk commodity users/producers at a local level

Relevance & inclusion

Not considered

Please explain

There are no other forest risk commodity users/producers at the local level are are relevant.

Regulators

Relevance & inclusion

Relevant, always included

Please explain

A risk assessment is conducted for each of Graphic Packaging's virgin mill's wood basket. 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 for each virgin mill's wood basket. 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

F3.1

(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 identified?
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. Risks that can affect Graphic Packaging's actual results and could cause such results to differ materially from estimates or expectations are disclosed in our Annual Report on Form 10k.

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

Risks exist, but no substantive impact anticipated

Please explain

Graphic Packaging's mills operate in the Southeastern United States, where we purchase wood from both large and small landowners. Deforestation is a low risk in this region as there is a robust supply of timber where harvest is less than or equal to growth. Risks that could occur, like significant rainfall resulting in reduced wood harvest as loggers are not able to operate in the forest, present no substantive risk because they would be short term in nature and Graphic Packaging has adequate operating practices to address.

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

Graphic Packaging will promote the environmental benefits of paperboard packaging. These benefits include that its packaging is made from a renewable material and is recyclable and that Graphic Packaging's wood basket is managed in a sustainable manner with low risk of deforestation or negative impacts to biodiversity.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Unknown

Likelihood

Likely

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

Although Graphic Packaging promotes the sustainable nature of paperboard packaging, which is widely recognized, it is one factor of many. Graphic Packaging's customers assess several factors in sourcing packaging. The packaging must meet the performance requirements, cost expectations, environmental requirements, etc.

F4. Governance

F4.1

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

Yes, we have a documented forests policy that is 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 eliminate deforestation and/or conversion Commitment to protect rights and livelihoods of local communities Commitment to innovation Recognition of the overall importance of forests and other natural habitats Other, please specify (Commitment to waste reduction and reuse of forest / fiber resources.)	Graphic Packaging has documented policy that is communicated internally and externally through our 2017 Sustainability report and in the sustainability section of our public website.

2018 GPI Forest_Fiber Certification Policy.pdf

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 eliminate deforestation and/or conversion Commitment to protect rights and livelihoods of local communities Commitment to innovation Recognition of the overall importance of forests and other natural habitats Other, please specify (Commitment to waste reduction and reuse of forest / fiber resources.)	Graphic Packaging has documented policy that is communicated internally and externally through our 2017 Sustainability report and in the sustainability section of our public website.
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>

2018 GPI Forest_Fiber Certification Policy.pdf

F4.2

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

Yes

F4.2a

(F4.2a) Identify the position(s) of the individual(s) (do not include any names) on the board with responsibility for forests-related issues.

Position of individual	Please explain
Board-level committee	Effective in 2019, Graphic Packaging's Nominating and Corporate Governance Committee has oversight of Graphic Packaging's sustainability program.

F4.2b

(F4.2b) Provide further details on the board's oversight of forests-related issues.

	Frequency that forests-related issues are a scheduled agenda item	Governance mechanisms into which forests-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Reviewing and guiding risk management policies Reviewing and guiding strategy	Forest / Fiber strategy will be discussed as appropriate and as related to marketplace requirements.

F4.3

(F4.3) Provide the highest management-level position(s) or committee(s) with responsibility for forests-related issues (do not include the names of individuals).

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

F4.5

(F4.5) Did your organization include information about its response to forests-related risks in its most recent mainstream financial report?

No, and we have no plans to do so

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	Graphic Packaging utilizes a strategic planning process that helps shape its overall business objectives and strategy. As part of this annual process, forest related risks and opportunities are also taken into consideration. Graphic Packaging's long-range plan assesses forest related risks and opportunities over a five-year time horizon with specific financial modelling over the initial three years. As part of Graphic Packaging's long-range planning, Graphic Packaging seeks to take the following into consideration, as well as integrating them into its 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 Graphic Packaging's long-range planning process, Graphic Packaging's assessment of forest related risks and opportunities have focused on macro influencers on its wood basket. These influences can be shifts in market demand from local, national and international demand patterns based on climate change 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 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	Graphic Packaging utilizes a strategic planning process that helps shape its overall business objectives and strategy. As part of this annual process, forest related risks and opportunities are also taken into consideration. Graphic Packaging's long-range plan assesses forest related risks and opportunities over a five-year time horizon with specific financial modelling over the initial three years. As part of Graphic Packaging's long-range planning, Graphic Packaging seeks to take the following into consideration as well as integrate into its 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 Graphic Packaging's long-range planning process, Graphic Packaging's assessment of forest related risks and opportunities have focused on macro influencers on its wood basket. These influences can be shifts in market demand from local, national and international demand patterns based on climate change 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 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	Graphic Packaging utilizes a strategic planning process that helps shape its overall business objectives and strategy. As part of this annual process, forest related risks and opportunities are also taken into consideration. Graphic Packaging's long-range plan assesses forest related risks and opportunities over a five-year time horizon with specific financial modelling over the initial three years. As part of Graphic Packaging's long-range planning, Graphic Packaging seeks to take the following into consideration as well as integrate into its 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 Graphic Packaging's long-range planning process, Graphic Packaging's assessment of forest related risks and opportunities have focused on macro influencers on its wood basket. These influences can be shifts in market demand from local, national and international demand patterns based on climate change 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 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?

Other, please specify (GPI has made a commitment to the American Forest & Paper Association)

F6.1b

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

Commodity coverage

Timber

Criteria

Zero net deforestation
No forest degradation
Avoidance of negative impacts on threatened and protected species and habitats
No conversion of High Conservation Value areas
Recognition and endorsement of the Universal Declaration of Human Rights
Resolution of complaints and conflicts through an open, transparent and consultative process
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%

Cutoff date

2000

Commitment timeframe

2020

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.

F6.2

(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

(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

Hardwood logs
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

91-99%

Please explain

The goal is to have 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)?

	Do you have system(s) in place?
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).

Timber

% of total production/consumption volume traceable

100%

Point to which commodity is traceable

Region

Description of traceability system

Graphic Packaging has 4 virgin paperboard mills, Texarkana, TX, West Monroe, LA, Augusta, GA and Monroe, GA. We source locally at each mill. Further the company 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.

Exclusions

<Not Applicable>

Description of exclusion

<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

Certification coverage

Consumption volume

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 SBD) were compliant with FSC, SFI and PEFC in 2018. All CRB paperboard is compliant with FSC and 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?	Smallholders engagement approach	Please explain
Timber	Yes, working with smallholders	Other, please specify (Graphic Packaging provide and facilitates training for all members of our wood supply chain including loggers, land managers, land owners, etc. As an example we host training sessions and also provide instruction.)	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>

F6.7

(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; the Board of Directors and operating level of the RPA100 and we engage with FSC directly and through an industry coalition.

F-PF6.10

(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

(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 (TICCIT))

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.

F7. Linkages and trade-offs

F7.1

(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

(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

F8.1

(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

F9.1

(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 and fiber certification requires resources to implement and adds additional costs. The marketplace, brands and retailers, have not been willing to share in the additional costs associated with these certifications and thus certification is limited in growth.

F9.2

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

Forest risk commodity

Please select

Coverage

Supply chain

Main measure

Reduced cost of certification

Comment

The cost of certification is a limiting factor for growth in certification. The forest / fiber supply chain is not able to absorb the costs and the market place has not embraced certification at a level to offset the incremental costs.

F18. Signoff

F-FI

(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.

F18.1

(F18.1) Provide the following information for the person that has signed off (approved) your CDP forests response.

	Job Title	Corresponding job category
Row 1	Executive Vice President, General Counsel and Secretary	Other C-Suite Officer

SF. Supply chain module

SF0.1

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

	Annual revenue
Row 1	6023000000

SF0.2

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

Yes

SF0.2a

(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

(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

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

Requesting member

Grupo Bimbo, S.A.B. de C.V.

Forest risk commodity

Timber

Form of commodity

Other, please specify (Recycled paperboard)

Third-party certification scheme

Other, please specify (The recycled paperboard is not certified)

Total volume of commodity sold to member

6614

Metric

Metric tons

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

100%

Comment

Graphic Packaging provides packaging that is made from 100% recycled fibers. The paperboard is certified to the RPA100 certification program that is only available in North America.

Requesting member

McDonald's Corporation

Forest risk commodity

Timber

Form of commodity

Primary packaging

Third-party certification scheme

PEFC Chain of Custody

Total volume of commodity sold to member

10451

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

Primary packaging

Third-party certification scheme

SFI Fiber Sourcing certification

Total volume of commodity sold to member

1138

Metric

Metric tons

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

100%

Comment

Requesting member

Symrise AG

Forest risk commodity

Timber

Form of commodity

Primary packaging

Third-party certification scheme

SFI Fiber Sourcing certification

Total volume of commodity sold to member

0

Metric

Metric tons

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

100%

Comment

Requesting member

McDonald's Corporation

Forest risk commodity

Timber

Form of commodity

Primary packaging

Third-party certification scheme

FSC Chain of Custody

Total volume of commodity sold to member

6463

Metric

Metric tons

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

100%

Comment

Requesting member

McDonald's Corporation

Forest risk commodity

Timber

Form of commodity

Primary packaging

Third-party certification scheme

SFI Fiber Sourcing certification

Total volume of commodity sold to member

346

Metric

Metric tons

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

100%

Comment

Data supplied is from Australia / New Zealand and GPIs operations in that region is compliant with SFI Certified Sourcing

SF2.1

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

Requesting member

Grupo Bimbo, S.A.B. de C.V.

Commodity related to the project

Timber

Category of project

Communications

Type of project

Other communications projects, please specify (Communicate the value of certification to you.)

Estimated timeframe for realization of benefits to customer

1-3 years

Details of project

Communicate the impact of certification to small family farms and small holders to encourage them to certify their forests.

Projected outcome

More certified forests and fiber.

Requesting member

McDonald's Corporation

Commodity related to the project

Timber

Category of project

Communications

Type of project

Other communications projects, please specify (Communicate the value of certification to you.)

Estimated timeframe for realization of benefits to customer

1-3 years

Details of project

Communicate the impact of certification to small family farms and small holders to encourage them to certify their forests.

Projected outcome

More certified forests and fiber.

Requesting member

Restaurant Brands International

Commodity related to the project

Timber

Category of project

Communications

Type of project

Other communications projects, please specify (Communicate the value of certification to you.)

Estimated timeframe for realization of benefits to customer

1-3 years

Details of project

Communicate the impact of certification to small family farms and small holders to encourage them to certify their forests.

Projected outcome

More certified forests and fiber.

Requesting member

Symrise AG

Commodity related to the project

Timber

Category of project

Communications

Type of project

Other communications projects, please specify (Communicate the value of certification to you.)

Estimated timeframe for realization of benefits to customer

1-3 years

Details of project

Communicate the impact of certification to small family farms and small holders to encourage them to certify their forests.

Projected outcome

More certified forests and fiber.

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