

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, food service, 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 low-cost paperboard mills and carton manufacturing plants, its proprietary carton, container and packaging designs, and its commitment to quality and service.

Sustainability is one of the strongest trends in the packaging industry today. Given the significant sustainability characteristics of paperboard, we are uniquely positioned to capture new opportunities with our global fiber-based packaging platform. We have a long history of environmental and social responsibility practices at the Company and we continue to improve our manufacturing processes.

At Graphic Packaging, our packaging solutions are made primarily from renewable wood fiber, and most of our paperboard packaging and food service products can be recycled today. We intend to leverage our industry-leading sustainability profile and continue to reduce our impact on the environment through our own operations and through innovative paperboard solutions. As part of our Vision 2025, we challenged our team to achieve significant improvements. In the next few years, we intend to reduce greenhouse gas emissions, non-renewable energy usage, and mill water effluents by 15%, and reduce the use of low-density polyethylene (LDPE) by 40%. In addition, we have established a 100% recyclability goal for all Graphic Packaging products. We are committed to continuous improvement to benefit the communities in which we live and work, and we will provide updates on milestones achieved in our annual sustainability reports.

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 2020 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 2020	December 31 2020

F0.3

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

USD

F0.4

(F0.4) Select the forest risk commodity(ies) that you are, or are not, disclosing on (including any that are sources for your processed ingredients or manufactured goods); and for each select the stages of the supply chain that best represents your organization's area of operation.

	Commodity disclosure	Stage of the value chain	Explanation if not disclosing
Timber products	Disclosing	Manufacturing	<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	This commodity is not produced, sourced or used by our organization	<Not Applicable>	<Not Applicable>
Other - Cocoa	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>

F0.5

(F0.5) Are there any parts of your direct operations or supply chain that are not included in your disclosure?

No

F1. Current state

F1.1

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

Timber products

Activity

Harvesting

Using as input into manufacturing process for power generation

Form of commodity

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Source

Smallholders

Single contracted producer

Country/Area of origin

United States of America

% of procurement spend

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).

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 products	91-99%	Packaging and products made from wood fiber both virgin and recycled represent the vast majority of the revenue for Graphic Packaging. These products include paper board cartons for food, beverage, food service and household goods.
Palm oil	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>

F1.5

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

	Data availability/Disclosure
Timber products	Consumption data available, disclosing
Palm oil	<Not Applicable>
Cattle products	<Not Applicable>
Soy	<Not Applicable>
Other - Rubber	<Not Applicable>
Other - Cocoa	<Not Applicable>
Other - Coffee	<Not Applicable>

F1.5a

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

Forest risk commodity

Timber products

Data type

Consumption data

Volume

10084450

Metric

Metric tons

Data coverage

Full commodity production/consumption

Please explain

<Not Applicable>

F1.5b

(F1.5b) For your disclosed commodity(ies), indicate the percentage of the production/consumption volume sourced by national and/or sub-national jurisdiction of origin.

Forest risk commodity

Timber products

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

<Not Applicable>

% of total production/consumption volume

100

Please explain

100% of Graphic Packaging's timber products are sourced in the SE region of the United States.

F1.6

(F1.6) 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 products

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?

> 6 years

Tools and methods used

Internal company methods

External consultants

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 an annual basis. In addition, the risk assessment conducted is a part of our purchasing process.

The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk.

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

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The company has determined that forest resources are adequate to meet future demand.

Quality of forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The company has determined that forest quality is adequate to meet future demand.

Impact of activity on the status of ecosystems and habitats

Relevance & inclusion

Relevant, always included

Please explain

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The company has determined that our activity and that of our supply chain partners is not generating a negative impact on ecosystems and habitats.

Regulation

Relevance & inclusion

Relevant, always included

Please explain

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The company has determined that regulation will not have a negative impact on our future demand for forest resources.

Climate change

Relevance & inclusion

Relevant, always included

Please explain

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The company has determined that climate change will not have a negative impact on our future demand for forest resources.

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. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. Water security is considered in these assessments. The company has determined that water security in relation to our forest management process is not relevant.

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 for managing our wood basket. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. Impacts on costs are included in these assessments. The company has determined that forest resource costs will not pose a significant impact on our financial structure.

Loss of markets

Relevance & inclusion

Relevant, always included

Please explain

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The purchasing process also requires that Graphic Packaging's suppliers agree to its expectations for fair and ethical business practices and additional expectations in our Global Supplier Code of Conduct. The company has determined that there is no material concerns on loss of market.

Leakage markets

Relevance & inclusion

Relevant, always included

Please explain

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The company has determined that leakage is not a significant concern.

Brand damage related to forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

Graphic Packaging understands that there could be brand damage related to forest risk commodities for our customers' brands if the company does not manage our wood basket responsibly. We operate in a low risk region therefore the risk is minimal but it is reviewed to assess if the relevance is appropriate and has changed. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The company has determined that there is no material concern on brand damage related to forest risk commodities.

Corruption

Relevance & inclusion

Relevant, always included

Please explain

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The purchasing process also requires that Graphic Packaging's suppliers agree to its expectations for fair and ethical business practices and addition expectations in our Global Supplier Code of Conduct. The company has determined that there is no material concern due to corruption.

Social impacts**Relevance & inclusion**

Relevant, always included

Please explain

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The purchasing process also requires that Graphic Packaging's suppliers agree to its expectations for fair and ethical business practices and addition expectations in our Global Supplier Code of Conduct. The company has determined that there is no material concern due ot social impacts.

Other, please specify**Relevance & inclusion**

Relevant, always included

Please explain

An annual risk assessment is conducted to include the wood basket of each of Graphic Packaging's virgin paperboard mills, (West Monroe, Louisiana, Texarkana, Texas, Macon, Georgia and Augusta, Georgia). This assessment is a part of our CoC and purchasing process. The company includes Forest risk in our Enterprise Risk assessment process (conducted annually) and Climate Change Enterprise Risk Assessment process (conducted biennially). A periodic assessment by a third party is conducted to assess future forest risk. The purchasing process also requires that Graphic Packaging's suppliers agree to its expectations for fair and ethical business practices and addition expectations in our Global Supplier Code of Conduct. The company tests whether there are emerging considerations and has not identified other concerns than have been disclosed.

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. Graphic Packaging understands that there could be brand damage related to forest risk commodities for our customers' brands if the company does not manage our wood basket responsibly. We operate in a low risk region therefore the risk is minimal, but it is reviewed to assess if the relevance is appropriate and has changed.

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

Relevant, sometimes included

Please explain

Our investors expect that Graphic Packaging is appropriately managing our wood basket. We provide an overview of our responsible wood management process in our annual ESG report, which includes responses to GRI (core) and SASB.

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 2012 and in 2017 Earth Worm (formerly The Forest Trust) assessed our program and provided feedback. Executives from Graphic Packaging also participate on the Board of Directors and Operating Committee of the Sustainable Forestry Initiative.

Other forest risk commodity users/producers at a local level

Relevance & inclusion

Relevant, always included

Please explain

The company tests whether there are emerging considerations and has not identified other stakeholders than have disclosed. There are no other forest risk commodity users/producers at the local level that 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

Relevant, always included

Please explain

The company tests whether there are emerging considerations and has not identified other stakeholders than have been disclosed.

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 products	No
Palm oil	<Not Applicable>
Cattle products	<Not Applicable>
Soy	<Not Applicable>
Other - Rubber	<Not Applicable>
Other - Cocoa	<Not Applicable>
Other - Coffee	<Not Applicable>

F3.1a

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

Graphic Packaging defines significant financial impact as a loss of key alliances and customers, sustained serious loss in market share or Company value with a long-term impact on reputation, litigation and/or regulatory/legislative response significance, and whether the event requires engagement of the Executive Committee and Board for all strategic risks including climate-related risks. These factors are weighed against: (a) The proportion of business units affected; (b) The size of the impact on those business units, and (c) The potential for shareholder or customer concern. A substantive financial impact of relatively high magnitude could occur because of a large change in one of these aspects, or small changes in all three combining to create a larger impact.

While Graphic Packaging does not specifically quantify what constitutes a material financial or operational impact in a general statement, the Company does disclose financial and strategic impacts in its filings with the SEC and communications with investors as appropriate to provide context on the business implications of extreme weather-related events. We do this to be transparent with our stakeholders. For instance, in 2019 the company disclosed the financial implications of the tornado that destroyed parts of the wood conveying system at our West Monroe, Louisiana mill. The publicly disclosed financial cost was approximately \$10 million. The extreme winter storm and damaging ice during the period of February 12-16, 2021 resulted in impacts to our Texarkana, Texas and West Monroe, Louisiana mill facilities. The company filed an 8-K on February 24 detailing the damages and provided an early anticipated impact to first quarter of 2021 financial results. When the company reported quarterly results, the total financial impact to the company from outages and storm related costs was quantified at \$29 million.

Graphic Packaging has identified specific sustainable forest management related commitments and they are included in our most recent Environmental, Social and Governance Report. These commitments are focused on a reduction of the environmental impact of the organization. Our Vision 2025 goals include a 15% reduction in greenhouse gas emissions, non-renewable energy use, water effluent at our mills, and collaborating with the AF&PA to achieve a 70% paper and paperboard recovery in the U.S. by the end of 2020. Additional goals and implementation targets for waste diversion, safety, forest and wood-fiber certification, and social responsibility are also key programs for our Vision 2025. Specific to Forest / Fiber management, our goals is to achieve compliance to a Forest / Fiber certification scheme at 100% of our global manufacturing facilities. That goal has been achieved and we strive to maintain it.

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?

	Primary reason	Please explain
Timber products	Risks exist, but no substantive impact anticipated	Potential risks identified have been determined to present no substantive impact.
Palm oil	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>

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 products	Yes
Palm oil	<Not Applicable>
Cattle products	<Not Applicable>
Soy	<Not Applicable>
Other - Rubber	<Not Applicable>
Other - Cocoa	<Not Applicable>
Other - Coffee	<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 products

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Direct operation

Primary forests-related opportunity

Increased R&D and innovation opportunities

Company-specific description & strategy to realize opportunity

Graphic Packaging will promote the environmental benefits of paperboard packaging. These benefits include that the company's packaging is made from a renewable material and is recyclable. Graphic Packaging's wood basket is managed in a sustainable manner with low risk of deforestation or negative impacts to biodiversity. A significant proportion of our customers are increasingly looking to source sustainable packaging for their products. Sustainability represents one of the strongest trends in the packaging industry and we continue to focus on developing more sustainable and eco-friendly manufacturing processes and products. The environmental benefits of paperboard are also viewed favorably by the marketplace. Graphic Packaging has a strong innovation pipeline with packaging solutions that are targeted for sustainability. In our Vision 2025, we have targeted \$400 - \$700 million over the period of 2020 – 2025 in net new product sales for our innovation efforts.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Medium

Likelihood

Likely

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure – minimum (currency)

400000000

Potential financial impact figure – maximum (currency)

700000000

Explanation of financial impact figure

We anticipate that investments in sustainable innovation will have a positive impact on revenue and as communicated in our 2025 Vision are targeted to generate \$400 - \$700 million over the 2020 to 2025 period.

F4. Governance

F4.1

(F4.1) Is there board-level oversight of forests-related issues within your organization?

Yes

F4.1a

(F4.1a) 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	Our Board of Directors has ultimate accountability and sets expectations regarding our culture and our purpose, values, and strategy relative to climate-change. Within our Corporate Governance Guidelines, our Board is responsible for reviewing, approving and monitoring business strategies and financial performance and ensuring appropriate oversight is in place. The Board fulfills these responsibilities through practices including approval of the annual operating and strategic long-range plans, review of results against such plans and review and approval of significant corporate actions. The Nominating and Corporate Governance Committee of the Board is responsible for the oversight and review of the Company's ESG policy and practices toward climate-related issues. This includes a review of the Company's ESG targets, public reporting and recommendations to leadership. The committee regularly reports to the board on ESG matters and has a formal review to approve the yearly ESG report.
Chief Executive Officer (CEO)	The CEO has ultimate responsibility for the implementation of sustainability practices across the Company. The CEO is a proponent of the strategy to achieve the company's Forest / Fiber management targets and meets with the Executive Leadership Team on more than a quarterly basis to monitor progress towards those goals. Example of Forest / Fiber decision made by the CEO: The CEO approved the 2025 Vision Forest / Fiber goals and is a Board member for the Sustainable Forestry Initiative.
Other C-Suite Officer	The individual on the leadership team with responsibility to reporting to the Board of Directors for forest-related concerns is the Executive Vice President, General Counsel and Secretary. This position has the highest level of responsibility towards forest-related activities, and participates on the Health, Safety, and Environmental (HS&E) Steering Committee. This committee meets every 60 days. This position regularly provides HS&E highlights to the Board and presents an annual compliance and corporate governance report addressing significant developments. Responsibility for forest-related concerns have been assigned to this position and the Business Unit leaders, including the EVP Mills, President of the America's division, the SVP of Europe and the SVP of Supply Chain because they have indirect and direct oversight of the VP of HS&E as well as the VP of Government Affairs and Sustainability, who maintain direct management of these areas.

F4.1b

(F4.1b) 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	Overseeing major capital expenditures Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding strategy	HS&E committee meetings are held approximately every two months. Safety, water-related and forest-related risks, CapEx projects, and other related topics are discussed as appropriate. Key programs and KPIs are reviewed and a summary is presented for review by the Board of Directors. Long-term business objectives and goals are reviewed by the Board in conjunction with the presentation of changes to forest management practices Enterprise risk management (ERM) includes forest-related risks on an annual basis, any concerns occurring with forest-related concerns are brought up to the executive team immediately.

F4.2

(F4.2) 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
Chief Executive Officer (CEO)	Both assessing and managing forests-related risks and opportunities	More frequently than quarterly	The CEO receives bimonthly reports of forest / fiber related concerns every 60 days via the HS&E Steering Committee. Or more frequently as appropriate. The CEO reviews this information and provides guidance before communicating it to the board. The Committee includes representatives from Sustainability, HS&E, Ops, Legal, Human Resources and Risk Mgmt. It reviews reports from the VP of Gov Affairs and Sustainability and the VP of HS&E. It reports on progress on forest-related risks & opportunities and performance to targets & goals as appropriate. The progress is reported to the CEO and board, in particular questions of forest demand and market availability are reviewed. The CEO is also appraised of forest / fiber-related risks and opportunities annually. The CEO approves allocation of certified materials. The VP of Gov Affairs and Sustainability provides strategic direction and monitors the impacts of forest / fiber-related regulations.
Chief Executive Officer (CEO)	Assessing forests-related risks and opportunities	Annually	The company's CEO is appraised of forest-related risks and opportunities annually. The CEO approves allocation of certified materials.
Other C-Suite Officer, please specify (The Executive Leadership team and Vice President of Gov. Affairs and Sustainability)	Both assessing and managing forests-related risks and opportunities	As important matters arise	Forest risks and opportunities are formally reviewed on an annual basis during a management review for our certification program and every 60 days. Summaries of the forest risks and opportunities reviewed every 60 days are reported to the Board of Directors. In addition, forest risks and opportunities are assessed as needed throughout the year.

F4.3

(F4.3) Do you provide incentives to C-suite employees or board members for the management of forests-related issues?

	Provide incentives for management of forests-related issues	Comment
Row 1	Yes	

F4.3a

(F4.3a) What incentives are provided to C-Suite employees or board members for the management of forests-related issues (do not include the names of individuals)?

	Role(s) entitled to incentive?	Performance indicator	Please explain
Monetary reward	No one is entitled to these incentives	No indicator for incentivized performance	
Non-monetary reward	No one is entitled to these incentives	No indicator for incentivized performance	

F4.4

(F4.4) Did your organization include information about its response to forests-related risks in its most recent mainstream financial report?

No, but we plan to do so in the next two years

F4.5

(F4.5) Does your organization have a policy that includes forests-related issues?

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

F4.5a

(F4.5a) Select the options to describe the scope and content of your policy.

	Scope	Content	Please explain
Row 1	Company-wide	Commitment to eliminate deforestation Commitment to protect rights and livelihoods of local communities Recognition of the overall importance of forests and other natural ecosystems Other, please specify (Commitment to waste reduction and reuse of forest / fiber resources.)	Graphic Packaging has a documented policy that is communicated internally and externally. The policy is posted on our public website. We also provide context on our Forest / fiber approach in our annual ESG report (https://www.graphicpkg.com/esg-disclosures).

2018-forest-fiber-certification-policy.pdf

F4.5b

(F4.5b) 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 products	Yes	Company-wide	Commitment to eliminate conversion of natural ecosystems Commitment to eliminate deforestation Commitment to no deforestation, to no planting on peatlands and to no exploitation (NDPE) Commitment to protect rights and livelihoods of local communities Commitment to transparency Commitment to stakeholder awareness and engagement Recognition of the overall importance of forests and other natural ecosystems Other, please specify (Commitment to waste reduction and reuse of forest / fiber resources.)	Graphic Packaging has a documented policy that is communicated internally and externally. It is posted on our public website. We also provide context on our Forest / fiber approach in our annual ESG report (https://www.graphicpkg.com/esg-disclosures).
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 - Cocoa	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F4.6

(F4.6) 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

F4.6a

(F4.6a) 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 to manage forest resources responsibly. This commitment is renewed annually and signed by company executives as appropriate.)

F4.6b

(F4.6b) Provide details on your public commitment(s), including the description of specific criteria, coverage, and actions.

Forest risk commodity

Timber products

Criteria

- No conversion of natural ecosystems
- Zero gross deforestation/ no deforestation
- Zero net deforestation
- Avoidance of negative impacts on threatened and protected species and habitats
- No conversion of High Conservation Value areas
- Resolution of complaints and conflicts through an open, transparent and consultative process
- 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%

Cutoff date

Not applicable

Commitment target date

2021-25

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. The company has maintained compliance to all certification standards throughout the reporting year of 2020. 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. 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. • 100% of manufacturing plants are compliant with a certification standard.

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

Yes

F6.1a

(F6.1a) Provide details of your timebound and quantifiable 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 products

Type of target

Third-party certification

Description of target

The company is compliant with FSC, SFI and PEFC at all of our manufacturing facilities. Compliance to these standards represents that Graphic Packaging meeting responsible forestry commitments, which include no conversion of natural ecosystems and Zero net deforestation. In addition and as stated in our ESG report; we are committed to biodiversity by utilizing the Forest in Focus Landscape Assessment tool (a collaboration of the American Forest Foundation and GreenBlue). The tool, now in the beta stage, will provide greater visibility on forest management in our wood basket and the essential impacts.

Linked commitment

No conversion of natural ecosystems

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

Target year

2025

Quantitative metric

<Not Applicable>

Target (number)

<Not Applicable>

Target (%)

100

% of target achieved

100

Please explain

Graphic Packaging is committed to the goals of sustainable forestry and promoting responsible resource management. 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. Our COC program assures we can trace wood fiber through our manufacturing process. Management of recycled fiber is also vital and we are certified to 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 supports 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%). The company endorses responsible forestry and requires that our wood suppliers and loggers be trained in sustainable forestry practices. The goal to of all Graphic Packaging facilities globally compliant with a certification standard by 2025 was achieved in 2019.

F6.2

(F6.2) 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?	Description of traceability system	Exclusions	Description of exclusion
Timber products	Yes	FSC, SFI and PEFC Chain of Custody	Not applicable	<Not Applicable>
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 - Cocoa	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.2a

(F6.2a) Provide details on the level of traceability your organization has for its disclosed commodity(ies).

Forest risk commodity	Point to which commodity is traceable	% of total production/consumption volume traceable
Timber products	Municipality or equivalent	100
Timber products	Mill	100

F6.3

(F6.3) Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)?

	Third-party certification scheme adopted?	% of total production and/or consumption volume certified
Timber products	Yes	100
Palm oil	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>

F6.3a

(F6.3a) Provide a detailed breakdown of the volume and percentage of your production and/or consumption by certification scheme.

Forest risk commodity

Timber products

Third-party certification scheme

FSC Chain of Custody

Chain-of-custody model used

<Not Applicable>

% of total production/consumption volume certified

100

Form of commodity

Hardwood logs

Softwood logs

Paper

Primary packaging

Volume of production/ consumption certified

10084450

Metric for volume

Metric tons

Is this certified by more than one scheme?

Yes

Please explain

100% of the company's manufacturing facilities are compliant with the FSC Chain of Custody, FSC Controlled Wood, SFI Certified Sourcing, SFI Chain of Custody and PEFC Chain of Custody Standards.

Forest risk commodity

Timber products

Third-party certification scheme

FSC Controlled Wood

Chain-of-custody model used

<Not Applicable>

% of total production/consumption volume certified

100

Form of commodity

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Volume of production/ consumption certified

10084450

Metric for volume

Metric tons

Is this certified by more than one scheme?

Yes

Please explain

100% of the company's manufacturing facilities are compliant with the FSC Chain of Custody, FSC Controlled Wood, SFI Certified Sourcing, SFI Chain of Custody and PEFC Chain of Custody Standards.

Forest risk commodity

Timber products

Third-party certification scheme

PEFC Chain of Custody

Chain-of-custody model used

<Not Applicable>

% of total production/consumption volume certified

100

Form of commodity

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Paper

Primary packaging

Volume of production/ consumption certified

10084450

Metric for volume

Please select

Is this certified by more than one scheme?

Yes

Please explain

100% of the company's manufacturing facilities are compliant with the FSC Chain of Custody, FSC Controlled Wood, SFI Certified Sourcing, SFI Chain of Custody and PEFC Chain of Custody Standards.

Forest risk commodity

Timber products

Third-party certification scheme

SFI Chain of Custody

Chain-of-custody model used

<Not Applicable>

% of total production/consumption volume certified

100

Form of commodity

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Paper

Primary packaging

Volume of production/ consumption certified

10084450

Metric for volume

Metric tons

Is this certified by more than one scheme?

Yes

Please explain

100% of the company's manufacturing facilities are compliant with the FSC Chain of Custody, FSC Controlled Wood, SFI Certified Sourcing, SFI Chain of Custody and

Forest risk commodity

Timber products

Third-party certification scheme

SFI Fiber Sourcing certification

Chain-of-custody model used

<Not Applicable>

% of total production/consumption volume certified

100

Form of commodity

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Paper

Primary packaging

Volume of production/ consumption certified

10084450

Metric for volume

Metric tons

Is this certified by more than one scheme?

Yes

Please explain

100% of the company's manufacturing facilities are compliant with the FSC Chain of Custody, FSC Controlled Wood, SFI Certified Sourcing, SFI Chain of Custody and PEFC Chain of Custody Standards.

F6.4

(F6.4) For your disclosed commodity(ies), do you have a system to control, monitor, or verify compliance with no conversion and/or no deforestation commitments?

	A system to control, monitor or verify compliance	Comment
Timber products	Yes, we have a system in place for our no conversion and/or deforestation commitments	<Not Applicable>
Palm oil	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>

F6.4a

(F6.4a) Provide details on the system, the approaches used to monitor compliance, the quantitative progress, and the non-compliance protocols, to implement your no conversion and/or deforestation commitment(s).

Forest risk commodity

Timber products

Operational coverage

Supply chain

Description of control systems

All Graphic Packaging Paperboard (CUK and SBS) were compliant with FSC, SFI and PEFC in 2019. All CRB paperboard is compliant with FSC and the RPA100 certification standard. As part of our Forest / Fiber certification program we conduct a risk assessment on wood purchases and paperboard purchases. Assessments on wood are conducted at our 4 virgin mills located in the U.S.. Paperboard purchases are assessed as part of our Due Diligence System and conducted globally. Paperboard sources (the paperboard mills) are reviewed for compliance to a certification standard on a global basis. Verification is conducted by the Forest / Fiber Certification internal auditing team. And by a third party auditor.

Monitoring and verification approach

First-party verification

Third-party verification

% of total volume in compliance

100%

% of total suppliers in compliance

100%

Response to supplier non-compliance

Retain & engage

Suspend & engage

Procedures to address and resolve non-compliance with suppliers

Developing time-bound targets and milestones to bring suppliers back into compliance

Please explain

In 2020 no supplier was out of compliance for wood or paperboard. GPI mitigates potential noncompliance's through the purchasing process. If a noncompliance were to be identified the noncompliance would be assessed for severity. If the noncompliance were server a suspension would be initiated and engagement would be addressed. Minor noncompliance's would be addressed with a retain and engage.

F6.7

(F6.7) Are you working with smallholders to support good agricultural practices and reduce deforestation and/or conversion of natural ecosystems?

	Are you working with smallholders?	Type of smallholder engagement approach	Smallholder engagement approach	Number of smallholders engaged	Please explain
Timber products	Yes, working with smallholders	Supply chain mapping	Other, please specify	100	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. The company uses the Forest in Focus tool developed by the American Forest Foundation (AFF) to help expand our engagement with small holders.
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 - Cocoa	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.8

(F6.8) Are you working with your direct suppliers to support and improve their capacity to comply with your forests-related policies, commitments, and other requirements?

	Are you working with direct suppliers?	Type of direct supplier engagement approach	Direct supplier engagement approach	% of suppliers engaged	Please explain
Timber products	Yes, working with direct suppliers	Supply chain mapping	Supplier audits	Please select	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. The company uses the Forest in Focus tool developed by the American Forest Foundation (AFF) to help expand our engagement to more small holders. The company is engaged with our 2 largest wood suppliers that represent over 50% of our wood supply. We conduct periodic audits , engage them in customer tours and educational programs. Our second largest wood supplier represents nearly 50% of the wood supply to our CUK mills while the largest wood supplier represents 100% of our wood supply at our SBS mills.
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 - Cocoa	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.9

(F6.9) Are you working beyond your first-tier supplier(s) to manage and mitigate deforestation risks?

	Are you working beyond first tier?	Type of engagement approach with indirect suppliers	Indirect supplier engagement approach	Please explain
Timber products	Yes, working beyond first tier	Supply chain mapping	Other, please specify	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. The company uses the Forest in Focus tool developed by the American Forest Foundation (AFF) to help expand our engagement to more small holders.
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 - Cocoa	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.10

(F6.10) Do you participate in external activities and/or initiatives to promote the implementation of your forests-related policies and commitments?

Forest risk commodity

Timber products

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

Global Reporting Initiative (GRI) Community Member

Forest Stewardship Council (FSC)

Programme for the Endorsement of Forest Certification (PEFC)

Sustainable Forestry Initiative (SFI)

Jurisdictional approaches

<Not Applicable>

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. The company also joined the GRI community in 2019 and responds to GRI Core in our annual ESG report.

F6.11

(F6.11) Is your organization supporting or implementing project(s) focused on ecosystem restoration and protection?

Yes

F6.11a

(F6.11a) 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 120,000 trees.

Start year

2008

Target year

Indefinitely

Project area to date (Hectares)

1

Project area in the target year (Hectares)

1

Country/Area

United States of America

Latitude

Longitude

Monitoring frequency

Annually

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 to middle school aged children.

F7. Verification

F7.1

(F7.1) Do you verify any forests information reported in your CDP disclosure?

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

F8. Barriers and challenges

F8.1

(F8.1) Describe the key barriers or challenges to eliminating deforestation and/or conversion of other natural ecosystems from your direct operations or from other parts of your value chain.

Forest risk commodity

Timber products

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

Addressing deforestation and conversion is made more difficult due to the amount of forested land that is necessary to support an organization like Graphic Packaging. Forest and fiber certification is one method but to truly make progress a culture of protecting forests and isolating them from managed forests is required. This is more prevalent in the US and where Graphic Packaging sources wood. Graphic Packaging continues to communicate and place value on the forest system by providing expectations to our wood supplier and land owners and modelling responsible wood purchasing responsibility. Forest and fiber certification requires resources to implement and adds additional costs. The complexity is amplified for organizations that purchase a lot of wood fiber which requires a lot of forest land. Managing all the land and forest owners and suppliers is a significant task and cost. 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.

Forest risk commodity

Timber products

Coverage

Supply chain

Primary barrier/challenge type

Limited supply chain engagement

Comment

Addressing deforestation and conversion is a supply chain responsibility. Forest and fiber certification can help but they require 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. And the ability to impact deforestation and conversion is compromised. The entire supply chain along with communities are required to best address deforestation and conversion.

F8.2

(F8.2) Describe the main measures that would improve your organization's ability to manage its exposure to deforestation and/or conversion of other natural ecosystems.

Forest risk commodity

Timber products

Coverage

Supply chain

Main measure

Greater customer awareness

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 marketplace has not embraced certification at a level to offset the incremental costs.

Forest risk commodity

Timber products

Coverage

Supply chain

Main measure

Greater stakeholder engagement and collaboration

Comment

Addressing deforestation and conversion is a supply chain responsibility. Forest and fiber certification can help but they require 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. And the ability to impact deforestation and conversion is compromised. The entire supply chain along with communities are required to best address deforestation and conversion.

F17 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.

F17.1

(F17.1) Provide the following information for the person that has signed off (approved) your CDP forests response.

	Job Title	Corresponding job category
Row 1	VP Gov. Affairs and Sustainability	Other, please specify (VP Gov. Affairs and Sustainability)

SF. Supply chain module

SF0.1

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

	Annual revenue
Row 1	6559900000

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) In F6.3 you were asked "Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)? Indicate the volume and percentage of your certified production and/or consumption". 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

Sigma Foods

Forest risk commodity

Timber products

Form of commodity

Softwood logs

Sawn timber, veneer, chips

Primary packaging

Third-party certification scheme

SFI Fiber Sourcing certification

Total volume of commodity sold to member

709

Metric

Metric tons

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

100%

Comment

Cartons supplied to Sigma Foods was CUK produced in GPI CUK mills.

Requesting member

McDonald's Corporation

Forest risk commodity

Timber products

Form of commodity

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Primary packaging

Third-party certification scheme

FSC Chain of Custody

Total volume of commodity sold to member

38260

Metric

Metric tons

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

100%

Comment

Cartons supplied to McDonalds was SBS, CUK and CRB produced in GPI paperboard mills.

Requesting member

McDonald's Corporation

Forest risk commodity

Timber products

Form of commodity

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Primary packaging

Third-party certification scheme

PEFC Chain of Custody

Total volume of commodity sold to member

38980

Metric

Metric tons

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

100%

Comment

Cartons supplied to McDonalds was SBS and CUK produced in GPI paperboard mills.

Requesting member

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

Forest risk commodity

Timber products

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

19850

Metric

Metric tons

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

100%

Comment

Cartons supplied to Grupo BIMBO were SBS and CUK produced in GPI paperboard mills

Requesting member

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

Forest risk commodity

Timber products

Form of commodity

Hardwood logs

Softwood logs

Sawn timber, veneer, chips

Primary packaging

Third-party certification scheme

PEFC Chain of Custody

Total volume of commodity sold to member

11

Metric

Metric tons

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

100%

Comment

Cartons supplied to Grupo BIMBO were CUK produced in GPI paperboard mills

Requesting member

The LEGO Group

Forest risk commodity

Timber products

Form of commodity

Primary packaging

Third-party certification scheme

FSC Chain of Custody

Total volume of commodity sold to member

4797

Metric

Metric tons

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

100%

Comment

Cartons supplied to LEGO were CRB purchased from external CRB mills.

Requesting member

The LEGO Group

Forest risk commodity

Timber products

Form of commodity

Softwood logs

Sawn timber, veneer, chips

Primary packaging

Third-party certification scheme

PEFC Chain of Custody

Total volume of commodity sold to member

665

Metric

Metric tons

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

100%

Comment

Cartons supplied to LEGO were CUK supplied by GPI CUK mills.

Requesting member

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

Forest risk commodity

Timber products

Form of commodity

Primary packaging

Third-party certification scheme

Other, please specify (RPA100)

Total volume of commodity sold to member

54

Metric

Metric tons

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

100%

Comment

Cartons supplied to Grupo BIMBO were CRB under the RPA100 certification program from GPI CRB paperboard mills.

SF2.1

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

Sigma Foods

Commodity related to the project

Timber products

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 of certification to small family farms and small holders to encourage them to certify their forests. Communicate the impact of certification to consumers to inform them that the tree fiber for the package is responsibly managed and did not lead to deforestation. Although Recycled board is a key material type communicating the circularity of fiber would be beneficial.

Projected outcome

Landowners are not sure why certification is a valuable marketing theme to brands and communicating the value proposition to the source of the wood will help increase certified forest lands. Consumers are confused by conflicting messaging through certain groups and social media. Communicating the role of certified tree fiber in reducing and eliminating deforestation will enhance the brand promise. Although Recycled board is a key material type communicating the circularity of fiber would be beneficial.

Requesting member

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

Commodity related to the project

Timber products

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 of certification to small family farms and small holders to encourage them to certify their forests. Communicate the impact of certification to consumers to inform them that the tree fiber for the package is responsibly managed and did not lead to deforestation. Although Recycled board is a key material type communicating the circularity of fiber would be beneficial.

Projected outcome

Landowners are not sure why certification is a valuable marketing theme to brands and communicating the value proposition to the source of the wood will help increase certified forest lands. Consumers are confused by conflicting messaging through certain groups and social media. Communicating the role of certified tree fiber in reducing and eliminating deforestation will enhance the brand promise. Although Recycled board is a key material type communicating the circularity of fiber would be beneficial.

Requesting member

McDonald's Corporation

Commodity related to the project

Timber products

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 of certification to small family farms and small holders to encourage them to certify their forests. Communicate the impact of certification to consumers to inform them that the tree fiber for the package is responsibly managed and did not lead to deforestation. Although Recycled board is a key material type communicating the circularity of fiber would be beneficial.

Projected outcome

Landowners are not sure why certification is a valuable marketing theme to brands and communicating the value proposition to the source of the wood will help increase certified forest lands. Consumers are confused by conflicting messaging through certain groups and social media. Communicating the role of certified tree fiber in reducing and eliminating deforestation will enhance the brand promise. Although Recycled board is a key material type communicating the circularity of fiber would be beneficial.

Requesting member

The LEGO Group

Commodity related to the project

Timber products

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 of certification to small family farms and small holders to encourage them to certify their forests. Communicate the impact of certification to consumers to inform them that the tree fiber for the package is responsibly managed and did not lead to deforestation. Although Recycled board is a key material type communicating the circularity of fiber would be beneficial.

Projected outcome

Landowners are not sure why certification is a valuable marketing theme to brands and communicating the value proposition to the source of the wood will help increase certified forest lands. Consumers are confused by conflicting messaging through certain groups and social media. Communicating the role of certified tree fiber in reducing and eliminating deforestation will enhance the brand promise. Although Recycled board is a key material type communicating the circularity of fiber would be beneficial.

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

SF3.1

(SF3.1) For your disclosed commodity(ies), do you estimate the GHG emission reductions and/or removals from land use and land use change that have occurred in your direct operations and/or supply chain?

Timber products

Estimate GHG emissions and removals from land use and land use change

No, but plan to do so in the next two years

Please explain

Our wood baskets are zero or positive from a growth to harvest perspective. We are growing equal to or more than the harvesting that is taking place. There is a potential that in the future we will be able to assess the impacts on CO2 and there is work in the industry to provide modeling that can be used. Specifically, Graphic Packaging is working with the Sustainable Forest Initiative to define the atmospheric carbon impact of each of our wood baskets. The timing to complete this work in 2022. We are willing to share our project and how we are approaching this assessment with SC members.

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

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

Please confirm below

I have read and accept the applicable Terms