

Child Labor and Remediation

This Policy outlines Graphic Packaging's expectation that child labor is not used in the production of our products, and it applies to all Graphic Packaging applicants, employees, suppliers, and subcontractors, regardless of geographic location.

In compliance with the United Nations International Labor Organization's Conventions (ILO) 138 and 182 relating to child labor, this Policy applies to permanent, temporary, informal and contract labor, whether directly or indirectly employed by Graphic Packaging as well as children who have been trafficked or sold into work. The application of this Policy will take into consideration the local and national laws of the applicable country or state of operation and will identify situations considered hazardous for all persons under 18 years of age. Local law enforcement authorities should be promptly advised of any instances of alleged and confirmed child labor.

This document provides guidance for any instance of child labor found within Graphic Packaging or its supply chain and includes a remediation process that can be followed by managers to ensure that child safety and rights are upheld and that the best interests of children are always served.

Policy

Graphic Packaging is committed to protecting the rights of young workers and remedying any instances of child labor. The Company does not hire individuals under the age of 15 and prohibits the hiring of individuals under the age of 18 for positions that would expose them to hazardous work or materials, including the production of Graphic Packaging products. Graphic Packaging will not engage in or condone the unlawful employment or exploitation of children in the workplace or the use of forced labor in our own operations or supply chain. No child is to be employed or engaged in the production of our products or the supply of materials or services to us. Graphic Packaging's facilities and suppliers must have a documented policy and effective procedures for age verification in place as part of the recruitment process and must retain valid age verification records for all employees.

Likewise, Graphic Packaging facilities and suppliers should also make themselves aware of the national and local child labor laws in the countries and states in which they operate and take appropriate action to ensure their company premises are not used for any form of child exploitation

Definitions

- *Child*: Anyone under the age of 15 or who is otherwise not legally eligible to work
- *Child Labor*: Work performed by a Child or Young Worker that deprives them of their childhood, their potential, and their dignity, and that is harmful to their social, physical, and mental development. This refers to work that is mentally, physically, socially, or morally dangerous and harmful to children, and interferes with their schooling, i.e., depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and hazardous work
- *Hazardous Work*: Any work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children. This includes working with chemicals, moving machinery, and sharp objects; working in confined spaces, at great heights or in excessively hot or cold conditions; being exposed to dust, fumes, or loud noise; lifting or carry-ing heavy loads; working overtime; or working at night
- *Young Worker*: A young person who is legally entitled to work, i.e., at least 15 years of age but less than 18 years of age

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(continued)

Remediation in the Event Child Labor is Identified

All incidents of Child Labor at a Graphic Packaging facility or supplier should be reported to Graphic Packaging's Chief Employment Counsel and Chief Audit Executive. In the event Child Labor is suspected or identified, the following actions must be taken immediately, as applicable:

- Remove any Child from the workplace and take steps to verify his or her age against official documentary evidence
- Remove the Young Worker from the task where Hazardous Work is present and transfer him or her to an alternative role without any reduction in pay or benefits

An investigation shall be immediately launched into any reported incidents of Child Labor at a Graphic Packaging facility or within our supply chain. Each incident of Child Labor should be treated on a case-by-case basis to ensure the best interests of the child are paramount and the response should be tailored to each child's needs. Each investigation into suspected or confirmed Child Labor shall document the names, ages, and contact details of the Child or Young Worker at issue.

If Child Labor is confirmed, a case management plan shall be created that includes the following:

- The identities of the child-focused organizations and authorities to which confirmed incidents of Child Labor were reported, including the date, time, method of reporting, and the name and title of the person to whom the incident was reported;
- The identities of any child-focused organization or authority to be included in or consulted regarding a case management plan;

- Copies of communications to the Graphic Packaging manager or Supplier explaining the incident and any legal implications of the same;
- A proposed resolution of the issue that is in the best interest of the Child or Young Worker and that ensures no breach of his or her Human Rights;
- If the Child or Young Worker needs special care due to slavery, exposure to chemicals or other Hazardous Work, a full assessment of any physical or psychological impacts and proposed treatment and support of the same.
- Domestic and international migrant or refugee children may be specifically vulnerable to Child Labor as they may not have access to basic education and health facilities and could also be separated from their par-ents. As such, a case management plan may need to provide for the Child or Young Worker's schooling and any financial assistance and alternative care including facilitating family reunification if necessary.

Graphic Packaging reserves the right to discontinue the business relationship with any Supplier that deliberately breaches this Policy or fails to demonstrate action towards an agreed remediation program. Graphic Packaging will regularly review and audit its own recruitment procedures to ensure its compliance with this Policy, and reserves the right to audit the recruitment procedures of its suppliers to ensure their compliance with the same.