

Whistleblower Policy (Global)

Purpose

Graphic Packaging is committed to providing a workplace that embodies its Core Values of Respect, Teamwork, Relationships, Integrity, and Accountability. Our Code of Conduct and other Company policies reiterate these Core Values and the standards of conduct and ethical behavior we expect of our officers, directors, employees, contractors, and suppliers. The Company is also committed to comply with all applicable laws and regulations. To ensure our compliance with the Company's Core Values, the Code of Conduct and other policies, and applicable law, the Company encourages anyone who suspects or witnesses conduct that violates a Graphic Packaging policy or applicable law to speak up and report the same. This Policy describes what matters are reportable, how employees may report matters without fear of retaliation, and how the Company will support and protect anyone who does report suspected violations.

Scope

This Policy applies to all Graphic Packaging applicants, employees, contractors, interns, suppliers, and visitors worldwide. Where this Policy conflicts with applicable laws or regulations or collective bargaining agreements, the latter will prevail in that particular jurisdiction. The Company reserves all rights available to it under applicable law.

Definitions

Whistleblower: A Whistleblower is someone who discloses Reportable Conduct under this Policy.

Reportable Conduct: Reportable Conduct includes any conduct you have reasonable grounds to suspect (i) violates Graphic Packaging's Code of Conduct, Core Values; (ii) violates an applicable law or regulation in a manner that is punishable by imprisonment for a period of one (1) year or more; or (iii) represents a danger to the public or the financial system. Examples of Reportable Conduct include, but are not limited to:

- illegal conduct, such as theft, violence or threatened violence, and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities;
- failure to comply with, or breach of, legal or regulatory requirements;
- conflicts of interest with the Company;
- discrimination or harassment based upon an individual's race, gender; and
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.

Reportable Conduct excludes Personal Work-Related Grievances as described below.

Personal Work-Related Grievances: A personal work-related grievance is a report of a behavior, event, or aspect of employment that has implications for the discloser personally and does not have significant implications for Graphic Packaging.

Examples include, but are not limited to, a concern involving or relating to:

- an interpersonal conflict between two employees that does not violate the Company’s Anti-Harassment and Anti-Discrimination Policy or Workplace Violence Policy;
- a decision relating to an employment action such as a transfer, promotion, schedule change, disciplinary action; a change in pay, benefits, or training opportunities; or any matter that might be addressed through a collective bargaining agreement grievance process, that does not arise from or otherwise implicate some type of discrimination, harassment, or retaliation; and
- management of unsatisfactory work performance in accordance with the Company’s performance management program.

Personal Work-Related Grievances do not qualify for protection under whistleblower laws or this Policy. Personal Work-Related Grievances must be raised with your supervisor, manager, or human resources representative.

Policy

The Company takes all allegations of Reportable Conduct very seriously. Anyone making a report under this Policy should make sure he or she has reasonable grounds to suspect Reportable Conduct. However, a Whistleblower does not have to prove his or her allegations and will not be subjected to discipline or other penalties if the information is found to be incorrect. Even so, knowingly making a false complaint about Reportable Conduct may result in disciplinary action.

Reportable Conduct should be reported to one of the following:

- a local human resources representative;
- the regional or divisional human resources representative or another member of human resources in your country or region;
- the executive vice president of human resources at EVP-HumanResources@graphicpkg.com; or
- the Graphic Packaging Business Conduct Alertline via its website at www.gpibusinessconductalertline.ethicspoint.com or via the toll-free number for your country. The Graphic Packaging Business Conduct Alertline is available 24 hours and reports may be made anonymously if the reporter chooses.

Country-specific Business Conduct Alertline telephone numbers:

Australia	1800565761
Austria	0800 017868
Belgium	0800 77 076
Brazil	0800 000 0572
Canada	1.866.898.3750 1.855.350.9393
China	400 120 3531
Croatia	800-528-422
Estonia	8000044232
Finland	800416130
France	0.800.90.2500
Germany	0800 1810751
Greece	0.080.012.6576

Italy	800 725 944
Japan	0800-700-9401
Mexico	800 681 6714
Netherlands	0800 0229398
New Zealand	0800 426 361
Nigeria	0-708-060-1816, then 866-898-3750
Norway	80062436
Poland	800005072
Russia	8 (800) 301-85-89
South Korea	00798 14 203 0389
Spain	900.991.498
Sweden	020-088 00 16

Indonesia	0800 1401907	Switzerland	0800 000 329
Ireland	1800 851 822	United Kingdom	0800 048 5494
		United States	1.866.898.3750

Please provide as much detailed information as possible so that your report can be investigated. Some useful details include:

- date, time, and location;
- names of person(s) involved, roles and their business group;
- your relationship with the person(s) involved;
- the general nature of your concern;
- how you became aware of the issue;
- possible witnesses; and
- other information that you have to support your report.

Anonymity

Individuals may complain about Reportable Conduct anonymously. Those who do will still be protected under this Whistleblower Policy and any applicable whistleblower laws. However, requiring complete anonymity may make it more difficult for us to investigate the Reportable Conduct or take action. By disclosing your identity, the Company can contact you directly to discuss your concerns, which will help us to investigate the complaint more quickly and efficiently.

Investigations and Confidentiality

All complaints of Reportable Conduct will be investigated in an objective and timely manner. All employees are expected to cooperate with investigations taken pursuant to this Policy. Failure to cooperate in an investigation may result in disciplinary action.

The Company will keep all complaints of Reportable Conduct confidential to the extent reasonably practical (i) to conduct a complete and fair investigation, or (ii) for review of Company operations by the Company’s Board of Directors, its Audit Committee or the Company’s independent public accountants and the Company’s counsel. If a reporter wishes to remain anonymous, it is not necessary that his or her name or position be provided in any notification; however, to ensure a proper investigation can be conducted, please provide as much information as possible.

If it is necessary to collect personal data during the investigation, the Company will abide by all applicable laws and regulations pertaining to the protection of personal data, in particular that the personal data of the persons involved will be processed by the Human Resources and Law Departments of the Company only for the purposes of investigating the reported conduct and will be communicated only to those who need to know about the reported conduct as well as to any public, administrative, or judicial authority as required.

If necessary, corrective action appropriate to the investigation’s findings will be taken. Possible corrective action may include, but is not limited to, training, coaching, verbal or written warnings, suspension, demotion, compensation adjustments, and termination. The Company will make every effort to inform those reporting violations of this Policy of the outcome of the investigation when feasible while maintaining confidentiality and privacy concerns pertaining to personnel actions.

No Retaliation

The Company is committed to prohibiting retaliation against those who themselves or whose family members report, oppose, or participate in an investigation of alleged unethical misconduct in the workplace. By way of example only, participating in such an investigation, includes, but is not limited to:

- Filing an internal report or complaint of a suspected violation of law, a Company policy, or the Core Values;
- Participating in or cooperating in an investigation regarding a report or complaint;
- Testifying in a legal proceeding as a party, witness, or accused regarding alleged unlawful activity;
- Filing a complaint with a government agency or regulator regarding a possible violation of law; and
- Assisting another employee who is engaged in any of these activities.

Anyone who believes that he or she is being retaliated against, or who observes retaliation by or against another person, should immediately contact human resources or the Graphic Packaging Business Conduct Alertline.

Graphic Packaging, at its sole discretion, reserves the right to amend or modify this Policy at any time and for any reason.