

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

FOR THE FINANCIAL YEAR ENDING 31 December 2021

INTRODUCTION

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the Act) and constitutes our Australian operations Modern Slavery Statement for the financial year ended 31 December 2021. It sets out the steps undertaken by Graphic Packaging International Australia Converting Ltd, a subsidiary of Graphic Packaging International, LLC (Graphic Packaging International) during year ending 31st December 2021 to ensure slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery") is not occurring within our business or supply chains.

Graphic Packaging International's Australian operations are overseen by an Executive Leadership Team comprising Finance, Operations, Sales, Marketing & Innovation and HR & OHS&E. Supply Chain is managed by the Director, Operations – ANZ who reports directly into the VP/General Manager – ANZ.

This is our third Modern Slavery Act Transparency Statement and we have made good progress in the past year, building on previous efforts and increasing our focus on preventing Modern Slavery in our operations and supply chain. We have continued to increase our commitment to fair labour practices and the depth and scope of our work on Modern Slavery. We recognise the increasing threat labour exploitation and Modern Slavery pose and our customers and suppliers share our concern.

In this statement, we set out the steps and activities undertaken across Graphic Packaging International globally to ensure Modern Slavery is not occurring within our operations or our supply chain since our last Modern Slavery Act Transparency Statement for the year ending 2020.

OUR BUSINESS

As a leader in packaging design and innovation that serves the world's most recognised brands in the food and beverage markets, Graphic Packaging International has a responsibility to be alert to business risks, however small, in our business and in our supply chains. We have a zero-tolerance approach to Modern Slavery and work with our customers and suppliers in a manner that reflects a strong sensitivity and concern for social responsibility and ethical dealings. Graphic Packaging International is committed to fair labour practices and prohibits the use of all forms of forced labour and any form of human trafficking. We are dedicated to driving transparency, creating sustainable value for our stakeholders, and ensuring that our employees can develop and realise their full potential.

OUR SUPPLY CHAIN

As a responsible manufacturer of paper-based packaging we understand our customers and stakeholders expect us to be transparent about our business and supply chain. We recognise the challenging complexity of supply chains and associated risk that can occur due to lack of visibility, such as poor working conditions, violation of human rights and labour exploitation. As such it is essential, we work with our suppliers to drive transparency improvements and mitigate future risks.

Graphic Packaging International's Australian operations is responsible for the sourcing of materials we require to manufacture our products in Australia, Our Australian converting facilities consume paperboard supplied from Graphic Packaging International's own mills in North America and also convert other paperboard purchased from external suppliers domiciled in Europe, Korea, South America and New Zealand. Graphic Packaging International works with long term supplies for our main raw material sourcing of key commodities which include carton board, printing inks, overprint varnishes, decorative materials and packaging materials. We believe these strong supplier relationships are the key to ensuring continuous improvement in supply chain working conditions.

Graphic Packaging International's partnerships are built in a socially responsible manner, and we are committed to strong ethics and business conduct standards. We demand the same attitude and commitment of all our suppliers and partners. Our procurement principles are to source for the best value, and we expect our supplies to meet these needs legally and ethically, and to provide equal opportunity.

OUR POLICIES

Key to our zero-tolerance to Modern Slavery is ensuring Graphic Packaging International have robust policies in place, relevant to the prevention of Modern Slavery. These policies aim to protect our employees' welfare and basic human rights and include:

- Code of Business Conduct and Ethics;
- Human Rights Policy;
- Anti-Slavery and Human Trafficking Policy;
- Policy Statement on Conflict Materials;
- Equity, Equal Opportunity & Diversity Policy;
- Anti- Harassment Policy; and
- Recruitment Policy and Procedure.

Our Global Code of Business Conduct and Ethics applies to all Graphic Packaging International's subsidiaries and affiliates across the globe and is based on Graphic Packaging International Global Group's core values. It outlines the principles, policies, and laws that guide all employees' activities and demonstrates Graphic Packaging International's commitment to human rights and fair labour practices.

We are committed to ensuring that people are treated fairly and with dignity and respect. Our hiring, training, compensation practices and other employment customs are free from discrimination and these practices are described in a detailed way in our Equity, Equal Opportunity & Diversity Policy, and Recruitment Policy & Procedure. We prohibit workplace harassment and do not tolerate bullying, intimidation or any conduct that may be considered harassment or lead to harassment or creates a hostile work environment for anyone. Guidelines for such behaviour and how it can be reported are provided in our Anti-Harassment & Anti-Discrimination Policy & Procedure.

In addition, we have implemented an Anti-Slavery and Human Traffic Policy. This policy has been designed to provide transparency in our business and highlight our commitment to ensuring Modern Slavery does not occur throughout our supply chains. It identifies the responsibilities of management in relation to the policy and lists the actions for raising any questions or for reporting suspected cases of Modern Slavery by employees and external individuals.

Graphic Packaging International's core values of Integrity, Respect, Accountability, Relationships and Teamwork are at the heart of everything we do and form the foundation of our Code of Business Conduct and Ethics which serves as a guideline as to how we engage with employees, customers, suppliers, and the community. Our Code of Code of Business Conduct and Ethics and Human Rights Policy encompass the international human rights principles set forth in the:

- UN Guiding Principles on Business and Human Rights;
- Universal Declaration of Human Rights and its two corresponding covenants;
- International Bill of Rights;
- United Nations Conventions on the Rights of the Child; and
- United Nations Conventions on the Elimination of Discrimination against Women.

Graphic Packaging International's approach to its business operations is informed by the OECD Guidelines for Multinational Enterprises, and the International Labor Organisation's 1998 Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Impact.

The implementation of all company policies is also supported by an embedded governance structure.

ALERTline

As reported in our previous statement, our employees are encouraged to speak up about ethical concerns with a Manager, Human Resources Representative, or online through our independent ALERTline, without fear of retaliation or negative consequences. The ALERTline is available 24 hours a day, seven days a week online or at the appropriate phone number for every Graphic Packaging International location worldwide. All ALERTline reports are investigated and Graphic Packaging International maintains the anonymity of the employees who report a concern should they nominate that option. ALERTline calls are also reported to the Board of Directors of Graphic Packaging International Holding Company.

In reinforcing the capabilities of the ALERTline as a tool for revealing incidents of Modern Slavery, the ALERTline includes a separate section for reporting specifically Human Trafficking/Anti-Slavery concerns. Each complaint received via the ALERTline is investigated and addressed promptly and must be completed in less than 30 days.

Global Supplier Code of Conduct

Graphic Packaging International expects its suppliers to conduct business responsibly, with integrity, honesty and transparency. To ensure our suppliers understand our global minimum expectations in the areas of business integrity, anti-corruption, labour practices, health and safety and environment management Graphic Packaging International has a Supplier Code of Conduct. This Supplier Code of Conduct is intended to complement Graphic Packaging International's Code of Business Conduct and Ethics and prohibits the use of child labour and all forms of forced or compulsory labour, including human trafficking and slavery.

All suppliers, contractors, consultants, agents and other providers of goods and services who do business with Graphic Packaging International entities are expected to follow this Supplier Code of Conduct or any relevant laws and policies that may apply to the specific services provided by them to Graphic Packaging International. To extend these commitments, Suppliers are also expected to communicate and apply this Supplier Code of Conduct and relevant policies throughout their supply chain. Suppliers' employees and contractors may request suspected violations of the Supplier Code of Conduct via the Graphic Packaging International ALERTline. Graphic Packaging International reserves the right to cease doing business with any supplier that does not share its commitment to conducting business ethically.

DUE DILIGENCE AND INITIATIVES

Our expectations from suppliers

At Graphic Packaging International we are committed to fair labour practices and upholding human rights as part of our company culture. It is the responsibility for all of us to operate ethically and legally while maintaining respect for all individuals.

Suppliers are critical stakeholders for Graphic Packaging International and are vital to our success. We endeavour to choose suppliers who share our commitment to high ethical standard as we operate in a responsible manner. We expect our suppliers to comply with all applicable laws and commit to conducting business in a manner which aligns with our Supplier Code of Conduct and other applicable policies. These policies require suppliers to protect human rights and treat all employees with dignity and respect. Suppliers shall prevent and not participate in human trafficking, involuntary labour, or underage labour, as well as seek approval of subcontractors.

We believe a continuing focus on transparency can help identify Modern Slavery risks. Thus, it is important we conduct due diligence within our supply chain and operations to understand whether there is evidence of Modern Slavery issues, and whether there are sufficient controls in place.

Supplier Questionnaire

Suppliers are subject to due diligence checks will include a supplier questionnaire they are required to fill out and return to our Quality Assurance Department as part of our Supplier approval process.

SEDEX

In 2015, we embarked on a journey to integrate our commitments to safety, the environment, human rights and diversity through a comprehensive compliance program; SEDEX. Our ANZ based facilities have completed self-assessment on labour standards, health and safety and environment through the platform and business practices have been audited by a third party under the Sedex Member Ethical Trade Audit (SMETA). SEDEX has continued to be an important platform for our relationships and collaboration with our customers in 2019.

Sustainability

Our sustainability strategy is fully connected and integral to how we operate our business and thrive as a company. In 2021 Graphic Packaging continued to make progress to achieve the company's social and sustainability goals. Our Vision 2025 which guides Graphic Packaging International's sustainability-driven business strategy, lays out bold goals and objectives which allow us to measure our progress and ensure we are on track. The four pillars of Vision 2025 are: Planet, People, Partners, Profit. We are proud Environmental, Social and Governance (ESG) principles are integral to our Vision 2025 goals and guide how Graphic Packaging International innovates for a healthier planet, supports, and develops employees, champions with our partners, engages with our communities and operates responsibly.

We have set ambitious goals to help steer our team towards achieving Vision 2025, and we will continuously monitor, report, and improve as we progress on our journey. In 2018 we issued Graphic Packaging International's first GRI-referenced Sustainability and Social Responsibility Report. With the publication of this report continuing in 2020, we are able to present our goals in the greater context of our environmental and social impacts and in alignment with our long-term growth strategies.

ASSESSING AND MANAGING THE RISK

Assessing the risk

At Graphic Packaging International, we believe acting ethically and responsibly is not only the right thing to do, but also strengthens our business. We are committed to transparency and accountability of our performance, and we realise conducting appropriate risk assessments is central to our supply chain management.

We have assessed the ongoing Modern Slavery risks in our supply chain based on the following criteria:

- **Industry Risk** - What type of commodities and services we source
- **Geographic Area** – Commodities sources from countries with weak labour laws have higher risk profile than others
- **Supply Chain Characteristics** – Is it a direct supplier relationship or do we use intermediaries
- **Supply Chain Risk** – How complex are suppliers' own supply chains
- **Supplier Size and Characteristics** – What is the size of supplier's business and is its impacted by seasonality
- **Insecure Workers Risk** – If any of the workforce is unskilled, temporary and/or seasonal, they are at higher risk of labour abuses
- **Agency Workers Risk** – Staff employed under temporary contracts and engaged by temporary staffing agencies is at higher risk than others.

Managing the Risk

Our approach to managing the risk of Modern Slavery forms part of our broader efforts to act ethically and responsibly in all our business dealings. Graphic Packaging International is committed to sourcing paperboard and carton board from certified chain of custody and non-controversial sources. We do not source wood fibre which is illegally harvested, and/or harvested in violation of traditional or civil rights. Every effort is made to ensure the wood fibre is sourced from reliable and traceable resources.

Based on the risk assessment conducted, we consider the areas at main risk of Modern Slavery to be within Graphic Packaging International's operation and supply chain where contracts, agency and temporary labour are used. Due to the moderate seasonality of parts of our business, to a certain extent we have to rely on such labour to meet our labour requirements for our manufacturing facilities. Labour hire agencies create an additional layer between employers and workers which might leave workers exposed to deceptive or forceful recruitment practices. As such we seek to limit our exposure by working closely with these agencies to ensure they have robust processes in place to manage risk in their operations.

TRAINING AND AWARENESS

Continuous development of our workforce and attention to the well-being of our employees is fundamental to our strategy to tackle Modern Slavery. Therefore we continue to work to ensure our employees at all levels who need to understand Modern Slavery have access to relevant information and materials. In 2020 we conducted refresher training on our Code of Business Conduct & Ethics where participants were reminded of our Core Values, Human Rights Policy and our policies prohibiting harassment and discrimination. This refresher training was delivered through e-learning courses, face to face meetings, and induction programs for new employees.

LOOKING AHEAD

The risk of Modern Slavery is evolving and we will continue our proactive approach to mitigating it.

In 2022 we will be focusing on the following of initiatives and activities to ensure there is no Modern Slavery in our supply chains or in any part of our business:

- Delivering refresher training on our Code of Conduct;
- Deliver refresher training on Modern Slavery/Human Trafficking;
- Participate in a third party SMETA audit for our ANZ based manufacturing facilities; and
- Publishing Graphic Packaging International's Environmental, Social and Governance (ESG) Report.

This Statement is approved by the Board of Graphic Packaging International LLC and the Executive Team of Graphic Packaging International ANZ.

Signed,



Sid Troiani

VP & GM Graphic Packaging International ANZ

27 May 2022