

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

FOR THE FINANCIAL YEAR ENDING 31 December 2022

INTRODUCTION

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the Act) and constitutes our Modern Slavery Statement for the financial year ended 31 December 2022. It sets out the steps undertaken by Graphic Packaging International Australia Converting Ltd ABN 56 107 485 898, a subsidiary of Graphic Packaging International, LLC (Graphic Packaging International) during year ending 31st December 2022 to ensure slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery") is not occurring within our operations and supply chain. We are pleased to report for the calendar year ending 31 December 2022 no instances of Modern Slavery were identified within our operations.

Graphic Packaging International's Australian operations are overseen by an Executive Leadership Team comprising Finance, Operations, Supply Chain, Quality Assurance & Continuous Improvement, Sales, Marketing & Innovation and HR & OHS&E. The Australian operations are supported by a centralised Supply Chain team, led by the National Supply Chain Manager ANZ.

This is our fourth Modern Slavery Act Transparency Statement and we have continued to build on previous efforts with increased focus on preventing Modern Slavery in our operations and supply chain. We remain committed 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 2022.

OUR BUSINESS

Graphic Packaging International is one of the world's largest manufacturers of paperboard and paper-based packaging for some of the world's most recognised brands of food, beverage, foodservice and other consumer products. The company operates on a global basis and its history extends more than 100 years, as numerous legacy companies have joined forces to create an ever-evolving corporation.

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 key Australian operations continue to maintain accreditation in ISO 14001, ISO 9001, ISO 22000, FSC, PEFC, and SFI.

OUR SUPPLY CHAIN

As a responsible manufacturer of paper-based packaging, we understand that 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 as well as converting other paperboard purchased from external suppliers domiciled in Europe, South Korea, South America, and New Zealand. Graphic Packaging International works with long term suppliers 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 remain committed to maintaining strong ethics and business conduct standards. We demand the same attitude and commitment of all our suppliers and partners. We constantly strive to choose suppliers committed to strong ethics and business conduct standards like our own. These standards include a commitment to conduct business responsibly, with integrity, honesty, and transparency and to prohibit the use of child labour and all forms of Modern Slavery.

CORPORATE GOVERNANCE AND POLICIES

To effectively tackle Modern Slavery, engagement at all levels of the organisation is required. Our Board of Directors at a Global level and the ANZ based Executive Leadership Team are highly engaged. In this regard, our ANZ Executive Leadership Team is responsible for ensuring appropriate processes are in place for maintaining the integrity of our legal and ethical compliance matters, and in our relationships with our customers, service providers, suppliers, employees, and relevant stakeholders. We are focused to support all customers, service providers, suppliers, employees, and relevant stakeholders to prevent or mitigate adverse human rights effects through education, mitigation, and compliance activities.

At a global level, Graphic Packaging International's Compliance Committee facilitates the development, implementation, and operation of an effective compliance and ethics program, and promotes an organisational culture which encourages law abiding and ethical conduct. It is a cross functional group which comprises membership from Legal, Human Resources, Internal Audit, IT, HS&E and is responsible for ensuring Graphic Packaging International meets its human rights responsibilities in all global locations in which it operates. The Committee meets regularly to discuss and assess emerging compliance topics. The responsibilities of the Committee include:

- **Risk Assessment** – assesses the risk of non-compliance with applicable laws or regulations and of unethical conduct by employee and third parties (including the risk of Modern Slavery)
- **Policies and Procedures** – develops appropriate compliance policies and procedures
- **Training and Communication** – increases employee awareness of compliance and ethics related policies and procedures
- **Auditing and Monitoring** – coordinates with internal audit to audit and monitor adherence to the compliance and ethics-related policies and procedures
- **Evaluation of Program Effectiveness** – reviews the relationship of the compliance and ethics program and evaluate the sufficiency of reporting channels and of investigations or any ethics violations.

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 remain 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, 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 an Anti-Slavery and Human Traffic Policy. This policy highlights 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 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.

In 2022 we expanded our Human Rights Policy and added a new Whistleblower Policy as well as Child Labour and Remediation Policy.

ALERTline

As reported in our previous statements, 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 specific 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 compliment 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 report 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 Supplied 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.

Prior to authorising any Significant Investment Agreement (SIA) we follow a strict due diligence process to understand the full extent of the assets and the organisation in which we are investing. To this end, Graphic Packaging International employs, a cross functional approach which involves the Finance, Strategy, Accounting, HR, Risk Management, Tax, EHS and Operations in the diligence process. The Legal department coordinates that process to ensure all key stakeholders get the information they need to help evaluate the potential transaction and risks as well as lay the foundation for a successful integration.

With out Human Rights Policy in mind, our due diligence includes the following actions:

- an assessment of the target company's labour practices;
- tours of the target facilities;
- interviews with key management and operational personnel;
- review of corporate documentation and financials; and
- human rights screening for 100% of our SIAs.

Supplier Questionnaire

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

Where a risk of Human rights violation is identified, Graphic Packaging International's remediation process includes education and support to determine possible controls with the affected stakeholders.

Contract Negotiations

Contract negotiations are critical for mitigating the risk of Modern Slavery. In 2023 we have commenced a programme whereby all key procurement agreements are reviewed to ensure Modern Slavery is not occurring within their operations and supply chain. Specific clauses relating to a commitment to conduct business responsibly, with integrity, honesty, and transparency and to prohibit the use of child labour and all forms of Modern Slavery will be incorporated in all contracts.

SEDEX

SEDEX has continued to be an important platform for our relationships and collaboration with our customers since 2019. In 2022 our ANZ based facilities attained reaccreditation under the SEDEX Member Ethical Trade Audit (SMETA). This audit programme is supported by a well-established procedure which can be used as a preventative measure for identifying Modern Slavery and ethical business violations. Any non-conformances identified during these site ethical audits, as well as observations are reported to the sites and recorded on the SEDEX platform where they can be seen by our customers. It is of immense importance to Graphic Packaging International to address any non-conformance in a quick and effective manner. In order to ensure efficient execution of any third-party audits and integration of new standard requirements, we have established regional Corporate Social Responsibility leaders and further enhancements to company policies and process.

Sustainability and ESG Reporting

Our sustainability strategy is fully connected and integral to how we operate our business and thrive as a company. Sustainability is incorporated at each stage of our manufacturing process. In 2022, 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 that 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 2022, we can present our goals in the greater context of our environmental and social impacts and in alignment with our long-term growth strategies. A copy of this report may be found at <https://www.graphicpkg.com/documents/2022/10/2021-esg-report.pdf/>.

ASSESSING AND MANAGING THE RISK

Identifying and 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 sourced 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; and
- **Agency Workers Risk** – Staff employed under temporary contracts and engaged by temporary staffing agencies is at higher risk than others.

We identify risks, including human rights, through a variety of processes, methodologies and tools. Some of our sources for risks identification include, but are not limited to:

- professional and trade related business associations and their publications and journals;
- engagement with our stakeholders (suppliers, employees, investors, customers, government agencies);
- input from numerous sources, including:
 - our Board of Directors, executive leadership and other company leadership;
 - communication from government agencies and employees;
 - media and industry alerts;
 - attendance at insightful ESG-focused and other conferences;
 - informal discussions and scenario analyses; and
 - our company ALERTline.

After we identify material risks, we evaluate and prioritise them using a scaled and weighted approach. The defined risk criteria are:

- significance of impact – the potential effect of an event;
- occurrence likelihood – the possibility a given event will take place; and
- speed of impact or velocity – the time between the occurrence of an event and its impact.

We have a robust internal control environment and seek feedback on the effectiveness of applicable control over material risks.

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 service contracts, agency and temporary labour are used. Due to the moderate seasonality of parts of our business, to a certain extent we must rely on such external agencies 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. Service providers providing cleaning service in the main comprised of migrant and unskilled workers who may be less aware of their inherent rights and legal protections. 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 2022 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.

INTERNAL CONSULTATION

Having regard to the corporate structure of Graphic Packaging International there are strong governance ties between the reporting entity and its parent entities. Critical policies which provide the foundation for our Modern Slavery program such as the Human Rights policy and Code of Conduct, originate at our parent entity and are disseminated globally. In addition, the reporting entity is subject to audits by the parent which include its compliance initiatives. Finally, the parent entity and the reporting entity share common directors to further strengthen the governance between the entities.

LOOKING AHEAD

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

In 2023 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:

- reviewing all key procurement agreements to ensure specific clauses relating to a commitment to conduct business responsibly, with integrity, honesty, and transparency and to prohibit the use of child labour and all forms of Modern Slavery will be incorporated in all contract;
- continuation with both induction and refresher training on Modern Slavery/Human Trafficking;
- 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

1 June 2023