

MODERN SLAVERY ACT TRANSPARENCY STATEMENT
FOR THE FINANCIAL YEAR ENDING 31 December 2020

Introduction

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth). It sets out the steps undertaken by Graphic Packaging International Australia Converting Ltd (GPIAC) during year ending 31st December 2020 to ensure that slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery") is not occurring within our business or supply chains.

GPIAC is a wholly owned subsidiary of Graphic Packaging International LLC. Its Australian operations are overseen by an Executive Leadership Team comprising Finance, Operations, Sales, Marketing & Innovation and HR & OH&S. Supply Chain is managed by the Director, Operations – ANZ who reports directly into the VP/General Manager – ANZ.

Our Business and Supply Chains

As a leader in packaging design and innovation that serves hundreds of the world's most recognised brands in the food and beverage markets, GPIAC has a responsibility to be alert to the 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. GPIAC 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 Relevant Policies

We have implemented a number of policies in keeping with our commitments to act ethically and with integrity in all of our business dealings and relationships. 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 GPIAC'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 and other employment practices 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.

Due Diligence

GPIAC expects its suppliers to respect human rights, including maintaining policies and procedures to prevent Modern Slavery in their business and supply chains. In order to ensure that suppliers in GPIAC's supply chains comply with our ethical standards, we have developed a Supplier Questionnaire. Our preliminary assessment is focused on our critical suppliers. Supporting the Supplier Questionnaire we have developed an Ethical Sourcing Policy. Our company requirements with respect to human rights, prevention of involuntary labour, employee health and safety and environmental performance are also referenced in tender documentation. GPIAC's employees who engage suppliers, vendors or individual contractors to work on behalf of GPIAC brief them on the supplier guidelines. In pursuit of our goals to act in a responsible and ethical manner in our business dealings all our facilities are SMETA accredited via the Sedex platform.

Education and Trainings

We believe that it our duty to continue increasing our focus on and raising awareness of the import issue of Modern Slavery. GPIAC are required to undertake regular training on Antitrust, the Company's Code of Business Conduct and Ethics and Anti-Bribery and Corruption to ensure they are aware of the continued need for high levels of corporate responsibility in their day to day work. Employees are also actively encouraged to raise and report any issue of concern to the Graphic Packaging International Legal Department via Alertline procedures.

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

June 2021