



GLOBAL SUPPLIER CODE OF CONDUCT

Purpose and Scope

At Graphic Packaging International, LLC (Graphic Packaging International), we believe acting ethically and responsibly is not only the right thing to do, but is also good for business. Our Procurement organization is committed to building a sustainable Supplier base that shares our commitment to operate ethically and responsibly and has developed this Global Supplier Code of Conduct (“**Supplier Code**”) to define our global minimum expectations in the areas of business integrity, anti-corruption, human rights, labor practices, health and safety, and environmental stewardship. Graphic Packaging International’s Supplier Code is intended to complement Graphic Packaging International’s Global Code of Conduct and the company’s other policies and standards referenced therein.

All suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with Graphic Packaging International entities worldwide (“Suppliers”) are expected to follow this Supplier Code and all relevant local laws, regulations, rules, and policies that may apply to the specific services provided by Suppliers to Graphic Packaging International. Suppliers are also expected to communicate and apply this Supplier Code and relevant policies with their suppliers. Unless otherwise expressly agreed to in writing a Supplier’s acceptance of a purchase order or supply of goods or services constitutes that Supplier’s acceptance of the terms set forth in this Supplier Code.

Graphic Packaging International reserves the right, as part of our supplier lifecycle management process, to assess a Supplier’s compliance with this Supplier Code and to cease doing business with any Supplier that does not share its commitment. All documentation that a Supplier may need to verify compliance with this Supplier Code and with the applicable laws and regulations of the country where the materials and products are produced must be maintained on-site at the facilities in which the materials and products are processed, produced or manufactured. All such documentation shall be made available to Graphic Packaging International, or its authorized representatives, upon request.

This Supplier Code may be enforced or amended by Graphic Packaging International, at its discretion.

Business Conduct Principles

Graphic Packaging International expects its suppliers to conduct business responsibly, with integrity, honesty, and transparency, and to adhere to the following principles:

1. Maintain awareness and comply with all local and national laws and regulations applicable to the Suppliers’ operations.

Graphic Packaging International is committed to high standards of ethical behavior, and compliance with laws and regulations are essential to protecting the reputation and long- term success of our business. We are committed to the highest standards of integrity, honesty, openness and professionalism in our global activities and have the highest respect for local, national and international laws and regulations. We expect Suppliers to behave ethically and appropriately in all dialogue as well as act in compliance with legal and industry requirements and seek to implement best practices in their industries.

2. Abide by all applicable antitrust and competition or trade control laws in countries of operation.

Graphic Packaging International is committed to conducting business legally and ethically within the framework of a free enterprise system and abides by all applicable anti-trust and competition laws in all countries in which we operate and expects our Suppliers to do the same.

Supplier must obey the trade laws of the United States, European Union, the United Kingdom, Switzerland and all countries of operation, including but not limited to laws and regulations concerning: anti-boycott requirements, the import or export of goods, services, or technology; government licenses or other approvals required to conduct transactions; sanctions prohibiting transactions with specific countries, companies, or individuals; product classification, valuation, labeling and transportation; and conflict minerals. Further, Graphic Packaging International prohibits its Suppliers from directing their proceeds of doing business with us to benefit persons, entities or countries that are targeted by such laws.

3. Compete fairly for Graphic Packaging International's business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.

Supplier must work against corruption and act in accordance with all laws related to bribery, including the Foreign Corrupt Practices Act, the UK Bribery Act, and any other applicable local laws. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means, and corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited.

Supplier must not engage in any form of bribery or extortion to secure a business advantage on behalf of Graphic Packaging International, including facilitating payments. Suppliers should not use illegal or inappropriate means to win business or obtain preferential treatment for Graphic Packaging International. This includes improperly securing favorable tax or customs treatment, receiving permits or regulatory approvals, or bypassing laws or regulations. Supplier is also prohibited from providing or offering gifts to Graphic Packaging International employees that could inappropriately influence Graphic Packaging International's business decisions or gain an unfair advantage.

4. Maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

Supplier is required to maintain accurate books and records that reflect the value and nature of actual and legitimate transactions and payments. The creation of falsified, inaccurate, incomplete or misleading documents is strictly prohibited. There shall be no actual or attempted participation in money laundering.

5. Protect personal data, information and intellectual property

Supplier must comply with all relevant data protection, data privacy and data security laws and regulations when processing personal information to protect personal information of anyone they do business with, including suppliers, customers, consumers and employees. In particular, Supplier must only process the minimum amount of personal data necessary to perform its obligations to Graphic Packaging International and only for the purposes set out in its agreement with Graphic Packaging International. Supplier must keep personal data confidential and secure at all times and will enter into appropriate data processing agreements and handle personal data and Personally Identifiable Information according to the requirements of those agreements and consistent with the principles outlined in the Graphic Packaging International Privacy Policies.

Supplier will implement sufficient measures to protect any Graphic Packaging International confidential information provided during business transactions. Any information or data provided by Graphic Packaging International should only be provided to Supplier's employees on a "Need to Know" basis only, consistent with purposes outlined in data processing agreements and with information protection protocols. Supplier must make sure they have the required approvals before accepting any external invitation to share Graphic Packaging International expertise or information. Documents containing confidential information no longer needed by the Supplier to conduct business on behalf of Graphic Packaging International should be either returned to Graphic Packaging International or destroyed consistent with Graphic Packaging International instructions. No confidential information in the Supplier's possession regarding Graphic Packaging International should be used to either engage in or support insider trading.

6. Protect and advance human rights in Supplier operations and value chain.

Graphic Packaging International is committed to the protection and advancement of Human Rights wherever we operate and expects its Suppliers to do the same. Supplier must abide by applicable international and national laws, regulations, and international standards, such as the International Labor Organization (ILO) Conventions, UN Declaration of Human Rights, UN Guiding Principles on Business and Human rights, Organization for Economic Co-operation and Development, and the International Bill of Human Rights. Graphic Packaging International will not tolerate the use of child or forced labor, slavery, or human trafficking in any of its global operations and facilities, including those operated by Supplier, or in Supplier's operations.

Supplier shall comply with applicable human rights laws and regulations, including but not limited to the US Tariff Act (Section 307), the US Dodd-Frank Act, EU Conflict Minerals Regulation, the UK Modern Slavery Act 2015, the Australia Modern Slavery Act, the California Transparency in Supply Chain Act, the Uyghur Forced Labor Prevention Act, and emerging supply chain due diligence laws in Europe, and be willing to share their compliance statements with these laws and regulations with Graphic Packaging International upon request.

Supplier should provide training to their employees and management regarding human rights, human trafficking, modern slavery, and child labor. Supplier must assure that their employees will not suffer retaliation for reporting or raising employment concerns, should provide a confidential way for workers to raise concerns, and should maintain clear record of employee grievances.

7. Encourage a diverse workforce and value chain free from discrimination, harassment or any other form of abuse.

Supplier should be committed to creating an inclusive and diverse workplace and to supporting diverse-owned businesses including, but not limited to, minority and women owned businesses, veteran-owned businesses, and LGBTQ+ owned businesses. Supplier must comply with all applicable employment non-discrimination laws and require their business partners to adhere to non-discrimination laws.

Supplier shall create a work environment in which employees and business partners are treated equally and with respect and feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical, sexual, psychological, or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Employment decisions must be based on qualifications, skills, performance, and experience. Discrimination based upon race, color, age, religion, gender or sex (including pregnancy), sexual orientation, gender expression, genetic information, disability, ancestry, political opinion, national origin, trade union membership, marital status, and veteran or military status shall be strictly prohibited.

Supplier should make reasonable accommodations for all employees' religious observances and practices.

8. Treat employees fairly, including with respect to wages, working hours and benefits.

Supplier shall comply with all applicable legal and regulatory requirements and will generally apply sound employee relations practices. Working hours, wages and benefits will be consistent with local laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits. Local regulations regarding recording of time and payment must be followed.

9. Prohibit all forms of forced or compulsory labor, including human trafficking and slavery.

Supplier shall not obtain employees or contractors through human trafficking or use coerced, forced, prison or slave labor. All work must be conducted on a voluntary basis and employees are free to withdraw from the employment relationship with reasonable notice. The use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control is prohibited, and Supplier shall not retain control of employee personal documents.

10. Prohibit the use of child labor.

Supplier must maintain official and verifiable documentation of each employee's date of birth or be able to confirm the same. In no instance shall a Supplier permit children under the age of 18 to perform work that exposes them to undue physical risks, that can harm their physical, mental, or emotional development or improperly interfere with their schooling needs.

11. Respect employees' right to freedom of association and collective bargaining.

Consistent with applicable law, Supplier shall respect employees' rights to join or refrain from joining associations and worker organizations and recognize the right to collective bargaining.

12. Provide a safe and healthy workplace for employees in compliance with all applicable laws and regulations.

Supplier shall proactively manage health and safety risks and strive for an incident-free environment where occupational injuries and illnesses are prevented. Supplier must implement management systems and controls that identify hazards and assess and control risks related to their specific industries. Supplier must appropriately communicate and train their employees on potential workplace and materials hazards and the use of personal protective equipment and provide protective equipment to workers in accordance with their job requirements. Supplier shall also provide to employees potable drinking water, adequate restrooms, fire exits and essential fire safety equipment, emergency aid kits, and access to emergency response services, including environmental, fire and medical.

Supplier is expected to have a health and safety program where safety performance goals and targets are set and measured. Supplier must be willing to share their safety performance and/or safety certifications with Graphic Packaging International upon request. Supplier will not retaliate against employees who raise concerns about workplace safety.

13. Supplier will provide Graphic Packaging International with products and services that meet all applicable safety standards and promote the safe use and disposal of their products.

Supplier should provide Safety Data Sheets containing all necessary product safety information for all hazardous substances. Supplier will immediately report to Graphic Packaging International any concerns about product or process safety.

14. Deliver products and services meeting applicable quality and food safety standards.

Graphic Packaging International is committed to producing high-quality and safe products across all our brands. Suppliers involved in any aspect of developing, handling, packaging or storing our products are expected to:

- Know and comply with the product quality standards, policies, specifications and procedures that apply to the products produced at your location.
- Follow and adhere to good manufacturing practices and testing protocols.
- Comply with all applicable federal, state, and local food safety laws and regulations.
- Report issues immediately to Graphic Packaging International that could negatively affect the quality or public perception of a Graphic Packaging International product.
- Supplier will maintain acceptable quality standards, integrate quality practices necessary to ensure the delivery of a product which meets or exceeds the contract requirements, and be willing to share external quality certifications with Graphic Packaging International.

15. Demonstrate a commitment to preserving the environment and complying with all applicable environmental laws and regulations.

The potential environmental impacts of daily business decision-making processes should be considered along with opportunities for conservation of natural resources, recycling, source reduction and pollution control to ensure cleaner air and water and to promote a circular economy. Supplier must comply with all applicable environmental regulations, mandates, and laws in their countries of operation. Training should be provided to employees and all relevant parties to ensure knowledge of and compliance with all necessary environmental policies. Additionally, Supplier must ensure that all necessary environmental certifications, permits, and registrations are kept up to date.

Supplier should promote the environmentally sound development, manufacture, transport, use, and disposal of their products and technologies in a way that uses resources efficiently, minimizes resource and water depletion, and reduces waste, as well as emissions to air, water, and soil.

Supplier is expected to measure their environmental performance, set targets to reduce their impact, transparently report their progress, and be willing to share their progress, as well as copies of their environmental management system certifications with Graphic Packaging International upon request.

16. Demonstrate a commitment to mitigating the impacts of climate change

Supplier is expected to assess their operations for risks and other potential business disruptions related to climate change impacts and implement measures to mitigate potential business impacts to Graphic Packaging International. Supplier should consider implementing actions to improve energy efficiency, reduce energy use, and consider the use of renewable/carbon free energy and other renewable resources in their operations and supply chain.

Supplier is expected to measure their greenhouse/carbon footprint, set targets to reduce their emissions, transparently report their progress, and be willing to share their progress with Graphic Packaging International upon

request.

17. Demonstrate a commitment to preventing deforestation and biodiversity loss

Supplier is expected to comply with laws and regulations to prevent deforestation and impacts to sensitive ecosystems, including but not limited to the US Lacey Act, US Endangered Species Act, emerging EU Deforestation regulations, and to comply with the principles outlined in the Graphic Packaging International Sustainable Forestry Policy. Graphic Packaging International is committed to protecting forests and their ecosystems from deforestation and to not sourcing forest materials or forest products from land conversion activities.

Supplier is expected to assess their operations and supply chains for deforestation risks and impacts on biodiversity and to track the origin of any forest materials used in goods or services provided to Graphic Packaging International. Suppliers will share material origin information, documentation/certification for sustainably sourcing forest materials, and applicable fiber certifications with Graphic Packaging International upon request.

18. Support compliance with the Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Graphic Packaging International.

To conduct business with Graphic Packaging International, Supplier must enter into contracts and issue purchase orders that mandate compliance with the Supplier Code. With prior notice, Graphic Packaging International may request Supplier to participate in a third-party assessment or audit to assess compliance with the Supplier Code.

19. Report suspected violations of the Code.

Graphic Packaging International promotes a speak up culture that does not tolerate retaliation. Supplier must speak up and notify Graphic Packaging International if they are aware of or suspect any unethical or illegal conduct impacting or involving our company. Supplier's employees or contractors in the United States may report suspected violations of the Supplier Code to the Graphic Packaging International Alertline at 1-866-898-3750. To find phone numbers outside the United States, or to report a suspected violation online for any country, go to: <https://secure.ethicspoint.com/domain/media/en/gui/30747/index.html>

The Alertline is available worldwide on a 24/7 basis. All reports are treated as confidential, whether provided through telephone or online format, and you may remain anonymous where permitted by law.

Any violation of the Supplier Code shall be considered as a material breach by the Supplier, and Graphic Packaging International reserves the right to take legal actions, including suspending or terminating the business relationship.