

# The Core of Our Success

Code of Business Conduct and Ethics



**Graphic  
Packaging**  
HOLDING COMPANY



Contents



Resources



# INTEGRITY

We are honest in what we do and say. We lead by example. We keep our promises, meet our commitments, and take pride in what we do. We respect our policies and live up to the trust others place in us. Our Company is built on truthfulness and trust.

## DISCLOSURES

We establish and maintain controls and procedures to meet public disclosure requirements of the U.S. Securities and Exchange Commission (SEC). Our disclosures are complete, accurate, and timely. We may ask you to provide information to help us file documents with the SEC as required by law. You have a responsibility to cooperate with requests and respond with accurate information.

Detailed guidelines are available in our Disclosure Policy or contact our [Law Department](#).



### KNOW ~ DECIDE ~ ACT

- Q.** We just completed a huge deal with a customer. Can I tell the good news to a friend who is considering buying shares in the customer's firm?
- A.** No. This is considered material, nonpublic information. If your friend buys stock based on what you tell her, both you and your friend would be breaking insider trading laws. Keep the news to yourself until it is publicized.

## Anti-Money Laundering

We do not tolerate money laundering. Money laundering is an effort to make it appear that money derived from an illegal activity is from a legal source. Masking a source of funds obtained unlawfully is a criminal act. Make sure customers are reliable and transactions are conducted with legitimate sources of funds. Be on the lookout for suspicious or irregular banking activities, such as payments coming from an unknown third party on a customer's behalf.





## ACCOUNTABILITY

We are personally responsible for doing our job to the best of our ability. We act with initiative, learn from our experiences, share our knowledge, and strive to continuously improve our performance. We are dependable and can be counted on to deliver results. We look out for each other's safety. We effectively use the resources entrusted to us.