



CODE OF CONDUCT

Fulfilling Our Vision





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OUR VISION



Our packaging plays a role in life's everyday moments for people all around the world. We aim to deliver better packaging, with a focus on sustainability, for a better planet. Our team members take great pride in that.

We put a lot of thought into our packaging solutions, whether they be boxes, cups, filter frames, trays, or clips. We think about how we can serve our customers with innovative products that meet their rapidly changing needs as well as those of society at large.

We think about how we can protect the planet by prioritizing sustainability in our processes and materials. And we think about the kind of company we are now and what kind of company we want to be in the future.

All this thinking has led us to **Vision 2030** – a wide-ranging strategic plan that aims to build upon past successes and extend Graphic Packaging International's leadership in sustainable consumer packaging. Built around four key pillars of **Innovation**, **Culture**, **Planet**, and **Results**, this plan challenges us to utilize the full breadth and depth of our global operations to meet ambitious goals for environmental protection while continuing to deliver results for our business.

Every one of us has a part to play in making Vision 2030 a reality. Our **Code of Conduct** ("Code") is here to help you better understand yours. The pages ahead will lay out our Company's five Core Values and set clear expectations designed to help each of us to create a culture based upon mutual respect and teamwork, stay in compliance with our policies and the law, and act with integrity.

A culture based upon our **Core Values** will help us maintain our hard-fought reputation in the marketplace so that we continue to attract and retain our most valuable asset: our people. And when things get complicated, following our Code will help you find answers to difficult questions, make ethical decisions, and speak up about concerns.

If you have any questions about the Code or how to apply any of its provisions, please contact your manager, human resources business partner, the Law Department, or the Global Compliance Office.

The future is never certain. But when a workforce as thoughtful, dedicated, and talented as ours unites around a singular vision, I predict only great things to come. It's an honor and privilege to be on this journey with you.

Sincerely,

Michael Doss

President and Chief Executive Officer

OUR CORE VALUES

Serving as the foundation of our culture and how we approach every project, our Core Values guide us as we work together toward success and a shared sense of purpose.



INTEGRITY

To us, integrity means honesty and leading by example. This means keeping promises, meeting commitments, and taking pride in what we do every day.



RESPECT

Each person's unique skills and abilities are valued. We solicit each other's ideas and honor diverse opinions. Everyone's contributions are appreciated and accomplishments are always recognized.



ACCOUNTABILITY

Each individual is responsible for doing his or her job to the best of that person's ability and delivering results. We never quit in meeting our commitments to our shareholders, customers, or employees..



RELATIONSHIPS

We have an unwavering commitment to listen to our customers and coworkers to create innovative solutions. This results in shared prosperity and allows us to build deep and lasting relationships.



TEAMWORK

The strongest teams share common goals and work together to achieve them. We encourage everyone's involvement and have each other's backs.

FOLLOWING THE CODE

We thrive as a Company when we are all united around a common vision that embodies our purpose and Core Values. This Code is here to help you better understand our vision by outlining the principles, policies, and laws that guide our actions at work. It also protects our personal integrity and safety by providing us with effective ways to react to common workplace issues, navigate complicated ethical dilemmas, and report misconduct and concerns.

This Code exists for everyone. It applies to every employee, officer, and director at Graphic Packaging and its subsidiaries worldwide. Together, we follow this Code – and insist that others follow it – by:

- » Acting in accordance with the law, our Core Values, and our policies
- » Behaving in a way that reflects positively on the Company
- » Avoiding any circumstance that may create – or even appear to create – a conflict of interest between ourselves and the Company
- » Speaking up about ethical concerns and misconduct
- » Pausing before you act and seeking guidance when you are unsure about the path forward

The Code covers a lot of ground but cannot anticipate every situation that might arise. If you need help interpreting a policy or applying our Code, ask your manager, Human Resources business partner, a senior or executive vice president, or someone from our [Global Compliance Office](#) or [Law Department](#).



Need some help?

Look for these tools throughout the Code:



Let's Unpack That highlights common situations you might run into and how to handle them



Know Our Policies offers links to Graphic Packaging's policies and other key resources



The Alertline provides a direct link to our hotline for you to report concerns



Resources provides contact information for resources such as Human Resources, the Global Compliance Office, and the Law Department



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COMPLYING WITH THE LAW

Following the law is non-negotiable. We comply with all applicable laws governing the work we do, and in some cases, go above and beyond. In cases where our policies are stricter than the law, follow the policy. Any time laws, local business practices, or customs conflict with our Code, do not try to resolve it on your own. Seek guidance from your manager, the [Law Department](#), Human Resources, the Compliance Office, or our General Counsel.





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SPEAKING UP ABOUT MISCONDUCT

We create stronger teams and better workplaces when everyone feels empowered to raise concerns. If you witness, learn of, or even suspect misconduct, you have a responsibility to speak up. When you become aware of potential violations of our Code, inappropriate or unsafe conduct, or illegal behavior, let us know by alerting one of the following resources:

Managers or Human Resources Business Partners

Your manager should be able to help you with most questions or concerns. But if the issue involves them, or you are uncomfortable discussing the issue with them, contact another manager or your Human Resources business partner. You may also escalate your complaint to the director of Human Resources for your business unit or the vice president of Human Resources for your division.

The Law Department

You can report violations directly to Graphic Packaging's [Law Department](#), which can offer guidance on issues including discrimination, harassment, human rights violations, corruption, conflicts of interest, trade laws, legal requirements or discrepancies, and other concerns.

Internal Audit or Global Compliance Office

You can raise concerns about fraud, theft, bribery, or other accounting or auditing irregularities directly to our [Global Compliance Office](#).

The Alertline

Graphic Packaging's Alertline is a confidential way for employees, suppliers and vendors, customers, and the general public to report known or suspected violations of Company policy or the law. Reports may be made anonymously, where allowed by local law. Available 24 hours a day, seven days a week, the Alertline is staffed by third-party ethics and compliance specialists who speak your local language and who will listen, ask questions, and report your concern to Employee Relations, the Law Department, or the Global Compliance Department. Reach the [Alertline](#) online where you can also find telephone numbers for your specific country.

What to expect when you call the Alertline

- > Be prepared to provide as much detail as possible (who, what, where, and when)
- > Graphic Packaging may need more information, so you will be assigned a report number that allows you to follow up on your case. This is especially important if you reported anonymously
- > Out of respect for privacy, Graphic Packaging may not be able to inform you of any disciplinary action taken
- > The Alertline is available to all employees, suppliers, and business partners

**Speaking up is the
first step toward
setting things right.**



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SPEAKING UP ABOUT MISCONDUCT

Reporting Concerns

We take all reports of violations and misconduct seriously and have procedures in place to investigate every report promptly and thoroughly. You are expected to cooperate fully in any investigations. While we always seek to keep the information you share as confidential as possible, there may be times when we must disclose some information as part of the investigation. If a violation of the Code, our policies, or the law is found to have occurred, we will take appropriate disciplinary action, up to and including dismissal. This includes violations stemming from malicious or dishonest reporting or attempts to obstruct or mislead investigators. Certain violations may also result in legal action, penalties, or criminal prosecution.

Non-Retaliation Policy

Graphic Packaging does not retaliate against anyone who participates in an investigation or reports a violation or concern in good faith. No one will prevent you from making a report, and you will not be disciplined or penalized in any way just for making a report. If you believe you are the target of retaliation or have witnessed retaliation against someone else, report it immediately.

“Good faith” means an honest and full report of all relevant information, regardless of whether your report uncovers actual misconduct.



Let's Unpack That

Q I have heard a rumor about a manager taking kickbacks from one of our business partners, but I really do not know if it is true. Will I get in trouble if I say something?

A No. Even if you do not know all the facts, a report you make honestly is considered in good faith. Since this is a potentially serious matter, you are right to speak up. Be clear in your report that it is probably a rumor and that you do not have evidence besides what you heard.



MANAGING OTHERS

This Code lays out standards for all of us. But if your job involves managing others, you have a unique set of responsibilities that go above and beyond. We count on our managers to lead others through their words and actions and set a positive example every day by:

- » Upholding the highest standards of professional conduct
- » Acting in the best interests of the Company as a whole
- » Making workplace health and safety their top priority
- » Promoting a sense of pride in the work of every employee
- » Helping employees achieve their full potential at work
- » Ensuring employees accurately and honestly document their work
- » Encouraging employees to follow the Code and report violations without fear of reprisal
- » Promptly reporting any and all inappropriate behavior, illegal conduct, or Code violations

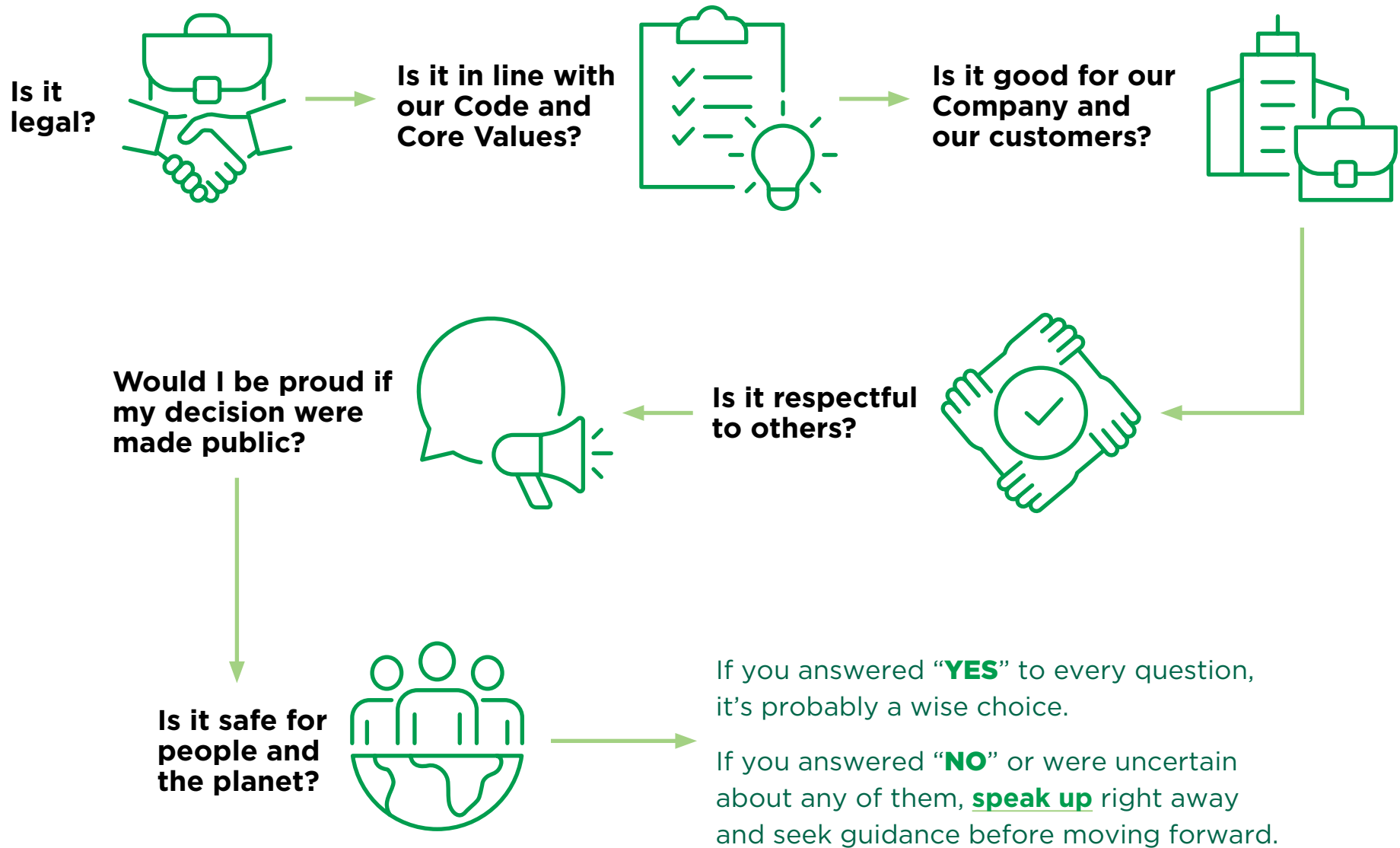
Managers make the difference

We look to our managers to create a welcoming, positive, safe, and productive work environment. Maintain an open-door policy where employees and their ideas are valued and respected.



MAKING ETHICAL DECISIONS

While this Code addresses some of the most common issues that may come up during your work, it's impossible to anticipate all scenarios. When faced with an unpredictable or difficult choice, ask yourself:



PROTECTING YOUR PRIVACY

Our work often requires the collection, use, and storage of personal data. We are committed to protecting this data and using it responsibly by:

- » Following all [records management](#) policies and data privacy laws
- » Only collecting the minimal amount of data necessary for legitimate business needs
- » Never collecting or processing data without a legal right to do so
- » Only sharing data via secured networks and systems approved by Graphic Packaging and practicing good [cybersecurity](#)
- » [Reporting](#) any known or suspected breaches or loss of data immediately

Remember, the loss of personal data has profound consequences. When personal data is compromised, it can damage people's finances and reputation and open our Company up to legal risks.



What is "personal data?"

These are just a few examples.
Stay alert for any harmful activity.

- > Names
- > Contact information (address, phone numbers, email, etc.)
- > Personal identification numbers
- > Birthdays
- > Bank accounts and financial statements
- > Medical and insurance records
- > Employment history
- > Religion
- > Sexual orientation
- > Ethnicity



Let's Unpack That



While using the copier, I found a document that someone left in there with a list of employees' names and salary information. What should I do?



You should take the document to your manager or Human Resources business partner right away and tell them about the incident. Do not copy or share the information with anyone else.



Know Our Policies

[Data Privacy Policy](#)

[Confidential Information and Works for Hire Policy](#)

PROTECTING CONFIDENTIAL INFORMATION

Graphic Packaging is an industry leader because of our creativity and ingenuity. So it's important to **safeguard** the confidential information, intellectual property, and trade secrets behind our methods.

When collecting or using confidential information, keep the following best practices in mind:

- » Never publicly release or share confidential information – especially information that could be useful to competitors or harmful to the reputation of Graphic Packaging or its customers.
- » Only share this information with those internal stakeholders who are authorized and have a legitimate business reason to know.
- » Only share this information with external stakeholders who have executed a contract or non-disclosure agreement provided or reviewed by the **Law Department**.
- » Whether dealing with hard copies or digital files, always store confidential information securely.
- » Label confidential information and trade secrets clearly and conspicuously.



Confidential information includes:

- > Marketing plans
- > Sales figures
- > Customer and supplier lists
- > Product prototypes
- > Research and development materials
- > Financial data



Let's Unpack That



My cousin is considering a career change and wants to know more about what my job entails. Would it be all right for me to show him some recent financial projections based upon customer sales and research and development projects I've been working on to help him learn more about my field?



No. While it is okay to share general information about what you do, you should not share confidential work materials with someone who is not authorized to see them – even family.



Know Our Policies

[Confidential Information and Works for Hire Policy](#)



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SAFEGUARDING COMPANY ASSETS

Company assets are the tools, equipment, facilities, and intellectual property we use to drive innovation. We all have a responsibility to protect these assets from loss, damage, waste, and improper use. But distinct kinds of assets require distinct kinds of protection.

Physical Property

Our work depends on the use of buildings, vehicles, equipment, machinery, supplies, and other physical assets. We protect these things by:

- » Only using equipment you are authorized and trained to use
- » Always consulting your supervisor before removing any Company property from a facility – including “borrowing” tools or taking away “scrap” materials
- » When appropriate, ensuring that the assets have been properly erased
- » Never giving away or selling assets without approval
- » Reporting lost or damaged equipment as soon as possible
- » Following all security procedures for facilities and vehicles

Using artificial intelligence (AI) responsibly

AI is rapidly changing how we do business and serve our customers. We understand our responsibility to use, design, and develop these tools ethically.

If your work involves AI, data analytics, or other digital technologies, stay aware of – and follow – all emerging laws and regulations, as well as our [Artificial Intelligence Use Policy](#). Never input [confidential information](#), intellectual property, or [personal data](#) into public AI tools, and always review AI outputs for accuracy and bias.



SAFEGUARDING COMPANY ASSETS

Information Technology

We rely on information technology (IT) tools to connect us and to help us perform our jobs. When using Graphic Packaging systems – including internet, intranet, email, and our IT Enterprise Systems – follow these best practices:

- » Only use Company systems and devices for Company business
- » Make sure communications align with our Core Values and policies – never use our systems to send or post **harassing**, intimidating, or threatening **messages** or inappropriate content
- » Remember that everything you send, receive, write, download, store, or transmit on our systems is Company property and may be reviewed by

Graphic Packaging at any time in accordance with applicable laws and policies



- » Seek approval before connecting personal devices to our network
- » Always practice good cybersecurity by:
 - > Avoiding pop-ups and unknown or suspicious emails and links
 - > Creating strong passwords, changing them regularly, and using two-factor authentication
 - > Only connecting to private and secure Wi-Fi networks
 - > Updating software regularly, and never downloading unauthorized software
 - > Completing all required training
 - > Reporting suspicious emails through the “Report Suspicious Email” button in Outlook



Know Our Policies

[Acceptable Use of Information Assets Policy](#)

[Text and Other Electronic Messaging Policy](#)

[Mobile Equipment and Security Policy](#)



Phishing and malware warning signs

Look out for emails and messages that:

- > Come from unknown or unexpected senders
- > Were sent outside of normal business hours
- > Include suspicious links or files
- > Create a sense of urgency or threaten imminent legal or financial consequences
- > Request personal or confidential information
- > Sound impersonal or contain poor spelling and grammar



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SAFEGUARDING COMPANY ASSETS

Work Product

You might not think of them as tools at first, but the work product we create – such as patents, trade secrets, trademarks, and copyrights – are vital assets for us. Never share such information with anyone either inside or outside of the Company without a legitimate business reason.

Graphic Packaging also retains ownership of work product such as machine, carton, or graphic designs; written and electronic documents; audio and video recordings; system code; and any concept or idea developed for the Company.



Know Our Policies

[Artificial Intelligence Use Policy](#)

[Confidential Information and Works for Hire Policy](#)

[Policy on Trading in Securities](#)

[Acceptable Use of Information Assets Policy](#)



Let's Unpack That



I see that we have a ton of scrap metal that seems to go to waste. I am going to collect it, sell it for cash, and donate the money to my favorite charity. Is that okay?



No. This would be considered stealing and a terminable offense. Before removing any scrap metal from your workplace, check with your manager or supervisor first.



A visitor forgot his temporary badge and asked me to let him into the building. Is that okay?



No, it is not. If someone without proper credentials tries to follow you as you enter one of our facilities, don't let them. Instead, refer them to security or the front desk for assistance.



I heard about a popular new piece of software that could really help speed up my work. Is it alright if I download it and give it a try?



No. We carefully vet all programs we use, and you should not download unauthorized apps or other software onto our systems. In addition to compromising the security of our systems, "free" apps may include terms and conditions that create financial liabilities for the company or conflict with our existing licensing agreements.





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PREVENTING THEFT OF COMPANY PROPERTY

Be vigilant for signs of theft like missing supplies or financial discrepancies, and **speak up** if something's not right. Theft in the workplace is about more than just missing pens and paper. It covers a wide range of assets, including:

- » **Money** – such as pocketing loose bills and misuse of Company credit cards
- » **Time** – such as falsifying timesheets to receive pay for time not worked
- » **Supplies** – such as taking home Company tools and scrap materials
- » **Products** – such as theft of finished packaging or raw materials
- » **Information** – such as stealing or sharing designs or trade secrets



Preventing wage theft

Wage theft occurs when employees are denied the pay they've earned for the work they've done – and we take it just as seriously as any other form of theft. Help prevent wage theft by:

- > Recording your hours accurately
- > Taking the meal and rest breaks to which you are entitled
- > Reporting any attempts to “dock pay,” make employees work “off the clock,” force unpaid overtime, or deny breaks



MAINTAINING ACCURATE RECORDS AND FRAUD

The integrity of our records is crucial to the ongoing health and success of our Company. Records guide our decisions and help us maintain the trust of our customers and stakeholders. The Company has zero-tolerance for fraud and corruption, including but not limited to forgery or alternation of documents, misrepresentation of information, and improprieties in the handling or reporting of money or financial transactions. When creating or handling records:

- » Always be accurate, clear, and complete
- » Never falsify records or make misleading entries, and never let someone else pressure you into falsifying records – no one has that authority
- » Follow all internal accounting controls and policies, as well as applicable laws and best practices
- » Obtain proper authorization for transactions when necessary
- » Report and correct errors immediately
- » Refrain from maintaining “off the books” funds or assets
- » Follow applicable data retention policies and laws for maintaining, storing, and disposing of records
- » Respond promptly to internal inquiries about financial records
- » Never destroy a record that has been requested as part of a lawsuit, investigation, or audit
- » **Speak up** immediately if you see or suspect anything suspicious



Let's Unpack That



It is the start of a new quarter, and my supervisor just asked me to modify the date on an invoice. My supervisor says, “It will look better if we count that one as last month.” Should I follow this directive?



No. We always strive for accuracy and honesty in our records. Changing or altering records to misrepresent business performance is unethical and could even constitute fraud. You should report this request immediately.



Know Our Policies

[Email and Instant Message Retention Policy](#)

[GPI Records Management Program](#)

KEEPING OUR WORKPLACE SAFE

We all have different roles, but we all share the most important job: keeping ourselves, our colleagues, and visitors safe. Graphic Packaging has an excellent culture of safety because we comply with applicable, health, safety and environmental regulations; customer expectations; and our Company's health, safety and environmental policies. We work collaboratively to improve our health, safety and environmental programs and performance; reduce risk; reduce impacts to the environment from our operations; reduce consumption of natural resources and energy; and promote environmental awareness and engagement of our employees and key stakeholders. We encourage our employees, visitors, suppliers, customers, and other stakeholders to **speak up** about unsafe conditions, potential hazards, or dangerous practices.

Drugs and Alcohol

The misuse and abuse of drugs and alcohol can impair judgment and create serious safety risks for yourself and others. While at work or conducting Company business, do not use, sell, or distribute illegal substances. And always:

- » Use prescription medications responsibly and disclose to your supervisor any usage of prescriptions that may impair your ability to work
- » Comply with all laws that apply to drug and alcohol use
- » Consume alcohol in moderation at Company events

If you have a problem with drug or alcohol use or think that a coworker might have one, seek help. Treatment may be available through our **employee assistance programs** and other local programs and resources.



Our safety absolutes

We maintain a zero-tolerance policy around the following safety violations:

- > Neglecting to lockout equipment in violation of lockout/tagout procedures
- > Neglecting to follow fall protection procedures
- > Neglecting to follow confined space permit procedures when entering a defined confined space
- > Bypassing, removing, or disabling a safety device
- > Reaching into moving equipment in violation of safe operating procedures
- > Operating a powered industrial vehicle in a reckless or threatening manner
- > Placing yourself or another employee in serious danger

If you witness or learn about any of the following violations, speak up immediately.

KEEPING OUR WORKPLACE SAFE



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Workplace Violence

Everyone deserves to feel safe and secure when they come to work. We strictly prohibit workplace violence, threats, and other behaviors that disrupt the workplace or put employees at risk, such as:

- » Physical acts of violence against a person or their property
- » Verbal or written threats, vicious statements, or hostile or threatening images
- » Possession of firearms or other weapons in our workplaces
- » Jokes or comments about violent events

Firearm possession

Except where provided by relevant, applicable law, we prohibit firearms, ammunition, explosives, weapons, and dangerous instruments of any kind (except for Company-issued tools and equipment) on Company property or in Company vehicles at any time. Graphic Packaging may search personal belongings and perform criminal background checks to the extent allowed by applicable law.



Let's Unpack That

Q The other day, the tail of a carton jammed my machine. I was able to pull it out quickly without having to stop the machine or use the lockout/tagout procedures. No one saw me, and I was not injured. If no one mentions it, everything is okay, right?

A No! Your safety and that of your coworkers is our primary concern. Under no circumstances should you reach into a moving machine in violation of lockout/tagout and other safety policies. Doing so violates the safety absolutes, even if no injury occurs, and may result in discipline, up to and including termination. If you see anyone bypassing a guard or lockout/tagout procedures to reach into a machine, you must immediately report it to a supervisor or manager.



KEEPING OUR WORKPLACE SAFE



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Finding balance

Fatigue and burnout are major contributors to workplace accidents and injuries. As a Company, we're committed to helping you find a healthy work-life balance that allows you to be your best on the job and at home. If you're feeling stressed or overwhelmed, Graphic Packaging offers a variety of [employee assistance programs](#) that may be able to help.



Let's Unpack That

Q My supervisor just came back from lunch and seems a bit tipsy. We have worked together a long time, and this is the first time something like this has happened. Should I just let it go and assume it was a one-off error in judgment?

A No, you should not. If you suspect a manager or coworker is under the influence of drugs or alcohol, you should take immediate action. If you are comfortable doing so, talk to your manager first. If not – or if there is an immediate safety risk – immediately report the issue to another manager or your Human Resources business partner. Even if this behavior is not habitual, it is still dangerous.

Q I noticed a coworker failing to follow proper safety procedures. When I pointed out the error, the coworker loomed over me with an angry glare and asked, "You want to do something about it?" I decided to back off. Was that the right thing to do?

A Yes. You were right to raise the issues and right to de-escalate for your own safety when your coworker began acting in a threatening manner. But your next step should be to report the issue to a manager or your Human Resources business partner.



Know Our Policies

[Global Health, Safety and Environmental Policy](#)

[Workplace Violence Policy](#)





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MAINTAINING A RESPECTFUL WORKPLACE

We are a stronger, more competitive Company when we maintain a culture that supports the physical, psychological, and social well-being of all employees. By creating a workplace where everyone feels valued and respected, we ensure each person can fully contribute and thrive. We maintain a respectful workplace by:

- » Proudly being an Equal Opportunity Employer that is free of discrimination based on race, gender, sexual orientation, age, religion, disability, or any other protected characteristics
- » Basing all employment decisions, such as hiring, compensation, training, and advancement, only on job-related qualifications
- » Reporting any incidences of **harassment**, discrimination, or bullying observed or suspected in the workplace. Remember that Graphic Packaging will not tolerate retaliation against those who **speak up** in good faith
- » Encouraging others to share new ideas and perspectives
- » Providing reasonable accommodations for those with disabilities



Let's Unpack That



Two coworkers of mine are fans of the same comedian and often quote his jokes, including some offensive ones about certain nationalities. No one else has complained though. Should I just try to tune them out?



No. Everyone has a right to feel respected and welcomed at work. Just because no one else on your team has spoken up does not mean that the jokes are okay or that others are not also offended. If you feel comfortable talking to your coworkers directly, ask them to stop. If you are not comfortable or they continue, address the issue with your manager or Human Resources business partner.



MAINTAINING A RESPECTFUL WORKPLACE


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Let's Unpack That

Q I just met with a candidate who seems qualified. But during the interview, I noticed the candidate was wearing hearing aids. Our team's work environment gets very noisy, and I worry about the candidate's ability to hear and communicate adequately. Should I factor this into my decision?

A No. As a manager, you are obligated to assess job candidates based solely on their qualifications, regardless of protected characteristics like physical disabilities. Making assumptions about the candidate's hearing violates our policies and potentially the law. Reasonable accommodations can always be made for candidates with disabilities. Always contact your Human Resources business partner or the **Law Department** with questions about accommodations.



What characteristics are protected by law?

Certain protected characteristics may vary depending on jurisdiction, but generally include:

- > Age
- > Race
- > Skin color
- > Physical or mental disability
- > Genetic information
- > Gender
- > Gender identity or expression
- > Marital status
- > Medical conditions
- > Ancestry
- > Military or veteran status
- > National origin
- > Religion
- > Sex
- > Sexual orientation
- > Any other characteristic protected by law



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PREVENTING HARASSMENT

An open and positive workplace starts with respect. That is why we maintain a zero-tolerance policy toward workplace harassment. Graphic Packaging does not allow bullying, intimidation, or any conduct that may constitute or lead to harassment, or which creates a hostile work environment. This policy extends to job applicants, employees, suppliers, contractors, visitors, and business partners.

Harassment takes many forms, including:

- » Bullying, such as verbal threats, epithets, profanity, or slurs
- » Hostile or threatening communications toward an individual group
- » Derogatory images, photos, drawings, posters, or gestures
- » Retaliation or threats of retaliation for reporting incidents of harassment
- » Sexual harassment, such as:
 - > Repeated, unwanted sexual advances
 - > Requests for sexual favors
 - > Unwanted or inappropriate touching
 - > Lewd or graphic jokes
 - > Displaying sexually explicit objects or images

We all have a part to play. Be thoughtful about your words and actions and remember that “That’s not what I meant” does not excuse bad behavior. If you see or experience disrespectful or inappropriate behavior, do not ignore it. If it feels safe to do so, tell the person to stop. However, if you are uncomfortable approaching the person directly, talk to your manager, Human Resources business partner, or the Executive Vice President, Human Resources right away.

Respectful 24/7

Our commitment to preventing harassment doesn’t end when we clock out. Remember that inappropriate behavior at offsite events, work-related social gatherings, or online can still constitute harassment, even if it does not occur at Company facilities or via Company systems.



PREVENTING HARASSMENT



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What does sexual harassment look like?

Sexual harassment takes two main forms:

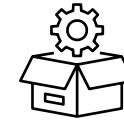
Quid pro quo - a situation where employment, raises, advancement, or other favorable professional treatment are offered in exchange for sexual favors.

Hostile work environment - a situation where the behavior of another person or group creates an environment that is difficult or intolerable due to sexually inappropriate or discriminatory behavior.

That said, sexual harassment looks very different on a case-by-case basis.

Remember that sexual harassment can:

- > Happen between members of the same or different sexes
- > Be verbal, physical, or visual
- > Take place via email, text, or social media
- > Involve suppliers, customers, or employees



Let's Unpack That

Q My supervisor has asked me out for drinks several times, and I have always declined. The last time this happened, my supervisor shrugged and said, "Oh well, guess you're not the kind that cares much about getting ahead at work." Is that considered sexual harassment?

A Yes. When employment decisions, such as promotions, are based on an employee's willingness to have a romantic relationship or grant sexual favors, this is considered sexual harassment and should be reported immediately. You should report this request immediately.



Know Our Policies

[Anti-harassment and Anti-discrimination Policy](#)

[Human Rights Policy](#)

[Whistleblower Policy](#)

COMMUNICATING ABOUT GRAPHIC PACKAGING

We are proud to share our vision and purpose with the rest of the world. But in a fast-paced media environment, it is important to make sure that public communications and disclosures are managed responsibly. We ensure consistent, honest, and correct messaging by:

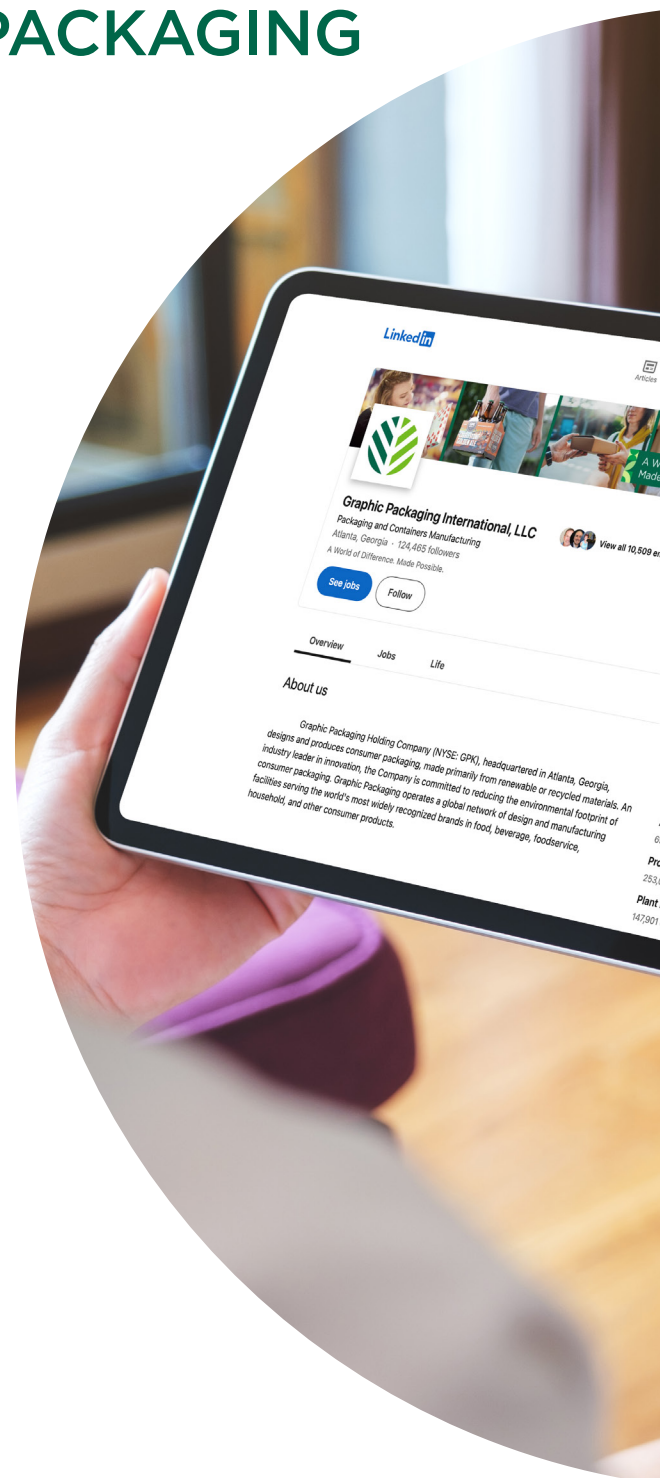
- » Not speaking to the media on Graphic Packaging's behalf unless specifically authorized to do so.
- » Directing all media requests to the VP, **Global Communications** pursuant to our Media Contact and Other External Communications Policy – this includes requests from traditional media outlets like newspapers and TV stations, as well as new media outlets like podcasts and blogs.
- » Seeking approval in advance before speaking at a public event as a representative of Graphic Packaging.
- » Never disclosing another individual's personal information or sensitive personal data unless it is allowed in accordance with Graphic Packaging's Data Privacy and Confidential Information and Works for Hire Policy.
- » Seeking approval in advance before publishing or distributing any material disclosures about the Company or its business.



Let's Unpack That

Q Someone I know on social media has been sharing articles claiming that several companies, including Graphic Packaging, are engaging in illegal waste dumping. I'm really tempted to post a reply saying I know first-hand from my work that this isn't true. Should I?

A No, you should not. While it is frustrating to see this kind of misinformation spread online, you should never claim to speak on behalf of the Company. If you see disinformation about Graphic Packaging online or in the media, report it to Global Communications. They will respond in a way that is accurate and reflects our brand's voice.



COMMUNICATING ABOUT GRAPHIC PACKAGING



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Social media

Public posts and even private messages on social media platforms can quickly take on a life of their own. Follow these best practices online.

- > Use good judgment and remember posts on any platform or app can last indefinitely.
- > Never disclose **confidential information** about Graphic Packaging, our customers, or business partners.
- > Do not disparage competitors or make false claims.
- > Do not present yourself as speaking on behalf of Graphic Packaging.
- > Remember our zero-tolerance policy on **harassment** and **discrimination** applies when posting online.



Let's Unpack That

Q A reporter on deadline contacted me seeking to verify basic information about Graphic Packaging. Since the reporter is in a hurry and isn't asking about anything confidential, should I just answer his questions?

A No. Only authorized spokespersons should speak on our behalf. You should direct the reporter to the Executive Vice President, Human Resources, the Global Communications office, or another authorized spokesperson.



Know Our Policies

[Confidential Information and Works for Hire Policy](#)

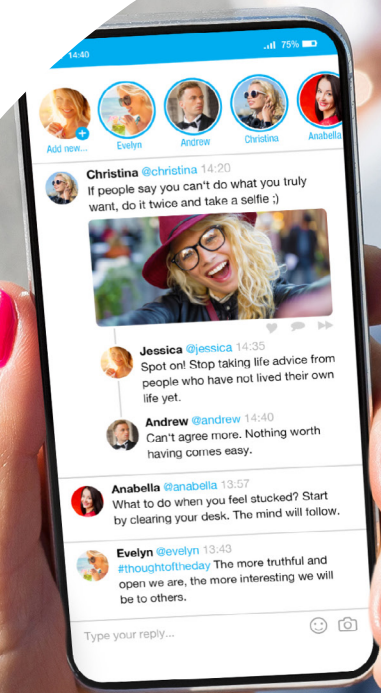
[Disclosure Policy](#)

[Data Privacy Policy](#)

[Media Contact and Other External Communications Policy](#)

[Social Media Policy](#)

[Policy on Trading in Securities](#)



AVOIDING BRIBERY AND CORRUPTION

Our success is built on the quality of our work, not underhanded deals or arrangements. We do not tolerate bribery or corruption anywhere within our operations. We follow all applicable anti-bribery laws in the places we do business as well as our own internal **Anti-bribery and Anti-corruption Policy**. We never offer or accept anything of value to improperly influence someone or gain some benefit, and we are especially careful with **government officials**, never offering them anything, whether a **gift, entertainment, or hospitality**.

Tips for Avoiding Bribery

- » Reject offers of gifts, entertainment, or hospitality that create an expectation of reciprocal gifts or favorable professional treatment in return.
- » Clearly and transparently document all transactions.
- » Never offer or accept gifts from government officials.
- » If you see or suspect bribery or corruption anywhere in our business or supply chain, **speak up** immediately.



It's not just cash

Bribes can be made using anything of value, such as:

- > Cash equivalents, like gift cards
- > Free products
- > Lavish gifts, meals, or hospitality
- > Stocks, bonds, or other securities
- > Kickbacks
- > Facilitation payments to speed up routine government actions
- > Professional favors or offers of employment
- > Discounts not available to others
- > Charitable or political contributions



Let's Unpack That

Q A supplier in another country bragged to me about “knowing how business gets done” in their country and paying special fees to get products through customs. Since I’m not the one bribing, can I ignore this?

A No, you should not. If one of our suppliers or vendors offers a bribe on our behalf, Graphic Packaging could be held responsible. They function as an extension of our business and must follow the same rules. Report this activity immediately.



Know Our Policies

Anti-bribery and Anti-corruption Policy



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PREVENTING INSIDER TRADING

In the course of your work, you may gain specific knowledge about Graphic Packaging and the companies we work with that would give you an unfair advantage when dealing in stocks and other securities. This knowledge is known as material, nonpublic information (MNPI), and using it to buy, sell, or gift stocks constitutes insider trading. Insider trading is a breach of trust and against the law. All employees and Company directors must abide by applicable insider trading laws.

Preventing Insider Trading

- » Never use MNPI as the basis of trade in Company securities, or the securities of suppliers business partners, or customers.
- » Do not engage in “tipping,” a practice wherein MNPI is passed along to others to influence trading decisions.



Examples of material, nonpublic information:

- > New product introductions
- > Sales transactions
- > Product developments
- > Impending litigation
- > Stock splits
- > Mergers and acquisitions
- > Leadership changes
- > Financial results and forecasts



Know Our Policies

[Policy on Trading in Securities](#)



SUSTAINING THE PLANET

Protecting and preserving the environment is central to our vision of the future. Historically, waste from single-use packaging has been a major contributor to environmental pollution. But through our commitment to creating new packaging innovations that are more circular, more functional, and more convenient, we will reduce carbon emissions, conserve natural resources, and drive sustainability throughout our industry. It's no easy feat, but it is achievable when we all contribute.

Keeping our word

When it comes to our environmental commitments, we do what we say and hold ourselves accountable. Find out more about how Graphic Packaging is advancing its sustainability goals by reviewing our annual [Sustainability Report](#).

Do Your Part

- » Conserve, re-use, and recycle resources whenever possible.
- » Follow all applicable environmental laws, know how these regulations apply to your job, and complete all required trainings.
- » Seek opportunities to lower carbon emissions and improve the sustainability of our processes and share them with our Company.
- » Make sure all supplies are sourced sustainably and hold our suppliers and vendors accountable to our same environmental standards.
- » If you observe or suspect environmental hazards or violations, report them immediately.



Let's Unpack That

Q My manager recently instructed me to dispose of recyclable scrap materials in the regular trash to save time, adding that, "It all ends up in the same place anyway." Should I follow this directive?

A No. It may not seem like a big deal, but our individual actions and choices add up and have a major impact on the planet. You should report your manager's request to another manager, a Human Resources business partner, or the Alertline.



Know Our Policies

[Sustainability Report](#)

[Global Health, Safety
Environmental Policy](#)

[Sustainable Forestry and
Deforestation Policy](#)



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COMPLYING WITH TRADE LAW

Our products are made to be shipped around the world, so we've built a company that is made for global trade. When conducting international transactions, we are committed to following the applicable laws of all countries involved regarding:

Imports and Customs

Laws ensuring accurate tariff classification, value, country of origin, product marking, and other elements.

Exports and Export Controls

Laws regulating or restricting the export of items due to national security, foreign policy, anti-terrorism, or non-proliferation.

Trade Embargos and Economic Sanctions

Laws prohibiting or restricting business dealings with certain countries or entities.

Anti-Boycott

Laws prohibiting participation in unsanctioned boycotts or a refusal to trade with a specific country.

Please consult the annual Import-Export memo issued by the Law Department that lists countries with export and sanctions restrictions. If there is ever a conflict between the laws of various countries, do not try to resolve it yourself. Seek guidance from our General Counsel or the [Law Department](#).

Global trade moves at a global pace

The laws governing international trade are complex and ever-changing. If your work involves imports and exports, stay knowledgeable and up to date.



Let's Unpack That

Q On social media, there have been calls to boycott one of our overseas suppliers due to alleged ties to Human Rights violations. Should I cancel upcoming shipments from this supplier?

A No. Graphic Packaging does not participate in unsanctioned boycotts. However, if you have concerns about the integrity or standards of a Graphic Packaging customer, vendor, or supplier, consult the Law Department to determine how to proceed.





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AVOIDING MONEY LAUNDERING

We are committed to fighting financial crime. That includes money laundering, which happens when money earned through criminal activity is moved through a company like ours to hide its true source and make it appear legitimate. To prevent this illegal activity:

- » Follow all anti-money laundering laws that apply. These laws call for transparency in business and banking transactions to spot illegal activities.
- » Know your customers well, including their identity and reputation to help Graphic Packaging ensure that everyone we work with is reputable and honest.
- » Keep detailed records of every transaction and follow our **recordkeeping** policies and procedures.
- » Stay alert for and report suspicious or irregular transactions and banking activity.



What should I watch for?

Suspicious activity, such as:

- > Attempted cash payments
- > Rapid movement of funds between accounts
- > Payments from unrelated parties
- > Complicated payment patterns
- > Transfers involving unrelated countries
- > Resistance to proper recordkeeping
- > Transactions that differ from a customer's typical pattern



UPHOLDING HUMAN RIGHTS

We have a duty to uphold human rights and respect workplace rights wherever we operate. The Company supports the objectives of the Ethical Training Institute (ETI) Base Code and substantially complies with the same. We demonstrate our commitment to human rights by:

- » Never employing anyone under the age of 15 and never employing those under the age of 18 in positions that would expose them to hazardous conditions or materials.
- » Ensuring employment is freely chosen and prohibiting the use of all forms of forced labor, including slave or prison labor, and any form of human trafficking.
- » Complying with our [Policy Statement on Conflict Minerals](#) by refusing to use any products or supplies that finance or benefit armed groups in the Democratic Republic of Congo and nine adjoining nations.
- » Providing working conditions that are safe and hygienic.
- » Respecting employees' freedom of association and right to collective bargaining.



What do human rights violations look like?

- > Child labor
- > Forced or compulsory labor
- > Human trafficking
- > Physical punishments
- > Unsafe working conditions
- > Unreasonable or illegal work hours
- > Wage theft

These are just a few examples.
Stay alert for any harmful activity.



UPHOLDING HUMAN RIGHTS

In addition, we are committed to engaging relevant stakeholders so that we can conduct credible human rights impact assessments, seek free prior informed consent from communities in which we desire to establish operations, and provide remedies for any negative human rights impacts.

Remember, the actions of our business partners reflect on us. We hold business partners to the same standards we hold ourselves, and we are striving to ensure there is no human trafficking, child labor, or forced or compulsory labor in our supply chain. Common signs of human trafficking include workers' identification documents being held or controlled by an employer or third party, workers living in unsuitable conditions with multiple people in a cramped space, workers being restricted from leaving their place of work or residence unaccompanied by their employer or a third party, and workers being required to pay recruitment and other fees to their employers in exchange for a job. If you witness or suspect human rights abuses anywhere in our supply chain, please report the issue.



Know Our Policies

[Human Rights Policy](#)

[California Transparency Act](#)

[UK Modern Slavery Act](#)

[Transparency Statement](#)

[Policy Statement on Conflict Minerals](#)

[Child Labor and Remediation Policy](#)

[Anti-counterfeiting Policy](#)

[Supplier Code of Conduct](#)

[Australian Modern Slavery Act Statement](#)

[Canadian Modern Slavery Act Report](#)



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PARTICIPATING IN POLITICAL AND CHARITABLE ACTIVITIES

We encourage our employees to play a role in shaping and bettering their communities. But whether your involvement takes the form of political engagement, volunteering, or charitable giving, it's important to keep these activities from interfering with your work. Keep these important rules in mind:

- » Make sure personal political and volunteer activities happen away from work on your own time. Never use Company funds or resources to support a personal political or charitable cause without approval from senior management or Human Resources.
- » Do not pressure coworkers, business partners, or customers to donate to or support a political campaign or charitable organization.
- » Never solicit or give donations to gain or retain business or favorable professional treatment.
- » Do not express political views on behalf of Graphic Packaging unless authorized to do so.
- » Refrain from distributing literature for community, political, or religious causes while on the job. Certain non-Company employees may do so only as part of an authorized charitable or community activity supported or sponsored by us.



Engaging our communities

As part of our commitment to responsible corporate citizenship, Graphic Packaging sponsors multiple volunteer and charitable opportunities aimed at eliminating hunger, protecting the environment, and investing in education. Through our Political Action Committee, we also host and sponsor certain political activities. You may be invited to support these various initiatives, but you should never feel pressured to participate. Retaliation for non-participation is never tolerated.



Let's Unpack That



A friend is organizing a fundraiser for a local civic organization. She knows I have expertise in graphic design because of my work at Graphic Packaging and asked if I could help createsome posters for the event. Can I help her?



Yes! Your talents and skills are your own and you are more than welcome to use them for personal causes. Just make sure your volunteer activities happen outside of work and do not make use of any confidential information, Company equipment, intellectual property, or other assets.

WORKING WITH CUSTOMERS AND SUPPLIERS

We build business relationships on integrity, trust, and a shared commitment to doing business responsibly. We expect our Suppliers to share our values and commit to and follow our Supplier Code of Conduct, which embodies the principles reflected in the Company's larger Code of Conduct. Our relationships with customers and suppliers directly impact our business and our reputation, so we act fairly and honestly in all our dealings. To protect and strengthen our reputation in every relationship and help us meet expectations:

- » Deal fairly in every interaction with customers, suppliers, competitors, and employees.
- » Seek the best possible terms for Graphic Packaging when purchasing goods or services and accurately document the transaction.
- » Do not offer or accept a **bribe**, payoff, kickback, or other payment on our Company's behalf to benefit yourself, a customer, supplier, developer, or their employees.
- » Use care with **gifts or entertainment**. Never offer or accept anything lavish or inappropriate. Follow our policies (and the other party's policies) to avoid the appearance of a bribe.



What does it mean to "deal fairly"?

It includes:

- > Following our policies and reflecting our values.
- > Protecting the rights of others.
- > Negotiating fairly and in good faith.
- > Using objective criteria to select suppliers, like reputation and ability to fulfill Graphic Packaging's needs.
- > Never taking unfair advantage of anyone by manipulating or falsifying information or documents.



Let's Unpack That

Q To be fair, is Graphic Packaging required to award business to the lowest bidder who responds to a request for proposal?

A Not necessarily. Beyond pricing, there are a number of other factors we must consider when awarding contracts, such as the supplier's record and reputation, quality of products and services, environmental stewardship, and commitment to integrity. Evaluate all suppliers thoroughly and fairly, considering all factors and impact on Graphic Packaging; and document your decision.



Know Our Policies

[Anti-bribery and Anti-corruption Policy](#)

[Supplier Code of Conduct](#)

[Antitrust Policy](#)



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ENSURING PRODUCT QUALITY AND SAFETY

Our customers depend on us, so we settle for nothing less than the highest levels of quality and safety in every package we create. We never “cut corners” to save time or money when it would result in an inferior product. You can help us maintain quality assurance by:

- » Following all laws and internal policies regarding quality and safety.
- » Completing required trainings and make sure your work follows all established processes and procedures.
- » Following sanitation guidelines and use personal protective equipment properly when required.
- » Never “skipping a step” or settling for substandard quality just to meet a deadline.





AVOIDING CONFLICTS OF INTEREST

We all have activities, interests, and relationships outside of Graphic Packaging. However, we must make sure these outside pursuits do not interfere with the jobs we do and the decisions we make while at work. We avoid conflicts of interest – or even the appearance of them – by:

- » Learning to recognize conflicts of interest
- » Disclosing conflicts when they do arise
- » Seeking guidance when we are unsure

Recognizing Conflicts

A conflict of interest can happen when your personal interests – or the interests of a friend or family member – interfere or appear to interfere with the interests of Graphic Packaging. Recognizing such conflicts are the best way to avoid them, but they can take many forms:

Professional Relationships

- » Supervising or making employment-related decisions for a relative or romantic partner who also works for the Company
- » Having decision-making authority over a supplier, customer, or business partner who is a relative

Outside Employment

- » Accepting any job that would interfere with your duties at Graphic Packaging, limit your performance, or harm our reputation.
- » Working for or providing advice to a competitor or supplier.
- » Sharing information about Graphic Packaging, our customers, or suppliers with an outside organization.
- » Serving as a manager, consultant, or director to a customer, supplier, competitor, or investment organization, without approval from the [Law Department](#).





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AVOIDING CONFLICTS OF INTEREST

Gifts, Entertainment & Hospitality

- » Offering or accepting anything that unfairly influences a business decision, makes you feel uncomfortable, or creates a sense of **obligation**.
- » Offering or accepting anything lavish, expensive, frequent, or non-customary.
- » Offering or accepting cash or cash equivalents, such as gift cards, stocks, or loans.
- » Offering anything of value to a government official or in order to retain business.

Financial Opportunities

- » Representing us in a transaction with another organization in which you or a relative have a material or financial interest without advance approval from our CEO.
- » Having a financial stake in a customer, supplier, or competitor.
- » Accepting a loan from any person or entity that does or seeks to do business with us (aside from recognized financial institutions at market interest rates).

Corporate Opportunities

- » Using your role at Graphic Packaging or Company assets for your personal benefit or the benefit of friends or relatives.
- » Reselling Graphic Packaging products.



AVOIDING CONFLICTS OF INTEREST

Disclosure

Life is complicated. And sometimes, even when we take all reasonable precautions, a conflict can still occur. If you suspect that you may have a conflict of interest, do not try to hide it. Be honest and transparent by discussing the situation with your manager. Discovering that you have a potential conflict of interest is usually not a violation of our Code, but continuing to work without disclosing it is a violation. Most conflicts can be avoided or mitigated if they are promptly disclosed.



Still not sure?

Ask yourself:

- > Would this situation interfere with my job responsibilities?
- > Would it affect the decisions I make on behalf of Graphic Packaging?
- > Would this look like a conflict to someone else?

If you answered “yes” or “I don’t know,” to any of these questions, there may be a conflict. Seek guidance before proceeding.



Let’s Unpack That

Q A former classmate who I’ve stayed in touch with casually over the years wants to bid on a project for Graphic Packaging. Is this okay?

A It should be fine, so long as you disclose the conflict of interest and avoid any involvement in the bidding, selection, or invoice approval process related to this project.



Know Our Policies

[Anti-bribery and Anti-corruption Policy](#)

[Policy Regarding Related Party Transactions](#)

[Disclosure Policy](#)

[Conflicts of Interest Policy](#)



COMPETING FAIRLY

We believe in playing by the rules. Creating better, smarter packaging solutions is how we get a leg up on the competition, not through unethical business practices. We fully comply with antitrust and competition laws, never enter agreements that would restrict competition, and gather information responsibly.



What Does Anti-Competitiveness Sound Like?

While talking with a competitor, did any of these topics come up?

- » Pricing or product strategies.
- » Boycotts of customers, suppliers, or other competitors.
- » Setting prices.
- » Division of customers, markets or territories.
- » Interference with bidding processes.
- » Misinformation or dishonest claims about other companies.

If any of them did, immediately stop the conversation, make it clear Graphic Packaging is not engaging in these practices, and change the topic or leave. If this is during a meeting, please note your objection in writing. If you suspect a violation has occurred, report it to the [Law Department](#).

Fact-find the right way

Knowing how our competitors operate helps us better understand the industry and the marketplace. However, it is important to gather information ethically.

- > Respect the intellectual property rights and confidential information of others.
- > Use only lawful, ethical, and publicly available sources when gathering information.
- > Never deceive, lie, or misrepresent yourself to gain a competitive edge.
- > Never offer **bribes, favors, or inappropriate gifts** to obtain information or a competitive advantage.



Know Our Policies

[Antitrust Policy](#)

[Anti-bribery and Anti-corruption Policy](#)

[Confidential Information and Works for Hire Policy](#)

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MAKING THE COMMITMENT

You have reached the end of our Code and hopefully have a clearer view of Graphic Packaging's vision for the future. Many challenges lie ahead of us, but so do even more successes and innovations. But making our vision a reality is going to take all of us working together as a united, global team.

That is why we are asking you to make two commitments:

The first commitment is to our vision of building a company that delivers results in a way that is innovative, ethical, inclusive, and sustainable.

The second commitment is to this Code, which will always be here to help you find a way forward when things seem uncertain. After all, when we do our jobs with purpose and we do them the right way, there is nothing we cannot accomplish.

Thank you for your commitment to our Core Values, our Code of Conduct, and our shared purpose:

We package life's everyday moments for a renewable future.



RESOURCES

If you ever need guidance, these Graphic Packaging International resources are here to help:

ISSUES OR CONCERNS

To ask questions, speak up about potential misconduct or other ethical concerns

CONTACT

» Your manager » Any other manager

» Human Resources » General Counsel

» Internal Audit

Or contact our Alertline:

Available 24 hours a day, 7 days a week

Visit [gpibusinessconductAlertline.ethicspoint.com](https://www.gpibusinessconduct.com/alertline) to file a report or find the toll-free telephone number for your region.

For information about Company benefits

» MyHR » The applicable Human Resources business partner

For questions about our policies or the law

Law Department
Law.Department@graphicpkg.com

For questions about financial and accounting issues

Global Compliance Office
Compliance@graphicpkg.com

For media inquiries

VP, Global Communications
Comms@graphicpkg.com

For sustainability questions

Sustainability@graphicpkg.com

For questions about Personal Data

The Privacy Office
Privacy@graphicpkg.com

Graphic Packaging International reserves the right to modify this Code at any time, as necessary, along with our policies, procedures, and conditions of employment. The Code is not intended as a contract or guarantee of employment.

No waiver of this Code may be made for a member of our Board of Directors or an executive officer without the written consent of our Board of Directors. Any such waiver must then be disclosed to the Company's stockholders, along with the reasons for granting the waiver.

Graphic Packaging International also supports an employee's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right. That includes activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards, and safety issues.