

UK Modern Slavery Act Transparency Statement for the Financial Year Ending 31 December 2023



**Graphic
Packaging**
INTERNATIONAL

I. SCOPE

This Modern Slavery Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It provides an update on the steps undertaken by Graphic Packaging International Europe UK Limited, a subsidiary of Graphic Packaging International, LLC. and other relevant GPI group companies¹ ("GPI", "Graphic Packaging", the "Group", the "Company", "we", "our", "us") during year ending 2022 to mitigate the risks of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery") across our business and supply chain.

At Graphic Packaging, our core values of Respect, Integrity, Accountability, Teamwork, and Relationships are imbedded into our **Code of Conduct** and govern how we conduct business across the globe. We are committed to ensuring that people are treated fairly and with dignity and respect throughout our Company, our supply chain, and in the communities where we operate. This commitment extends to protecting human rights; the eradication of slavery and human trafficking; equality among people; employee well-being and security; personal freedom from persecution; privacy; and economic, social, and cultural freedom.

This is Graphic Packaging's seventh Modern Slavery Act Transparency Statement, and it outlines the steps we took during the 2023 financial year to prevent and reduce the risk that modern slavery, forced or compulsory labour, human trafficking, and child labour, pose to our operations and supply chain in the United Kingdom and beyond.

A. Our Operations

Graphic Packaging International designs and produces consumer packaging, made primarily from renewable or recycled resources. As one of the world's largest providers of paperboard consumer packaging, Graphic Packaging operates a global network of design and manufacturing facilities serving the world's most widely recognized brands in food, beverage, foodservice, household, and other consumer products. Our products touch millions of people around the world every day. Our packaging keeps your breakfast cereal fresh and holds the hot tea or coffee that helps get you moving in the morning. It preserves the ready-to-cook evening meal that gives you more time with family and friends. Beyond the kitchen, it also holds and protects a host of beauty, healthcare, and household products that you use daily. Our solutions make every part of the day easier, safer, and more convenient.

An industry leader in innovation, the Company is committed to reducing the environmental footprint of consumer packaging. Our packaging starts with trees, a renewable resource. We design it to be recycled, and our innovative solutions continue to provide our customers and consumers with improved convenience and functionality. We work across the value chain to make it easier for people to recycle our packaging – and, in doing so, we can play our part in the circular economy and support a more renewable future for generations to come.

¹ This statement sets out the steps taken under section 54 of the Modern Slavery Act 2015 by the following Graphic Packaging International, LLC subsidiaries: Graphic Packaging International Bardon Limited, Graphic Packaging International Limited, Graphic Packaging International Gateshead Limited, Graphic Packaging International Europe UK Limited, Graphic Packaging International Foodservice Europe Ltd, GPI Cambridge Ltd, GPI Highbridge Ltd, GPI Rotherham Ltd.



The Company has approximately 23,800 employees in its 114 locations spread across countries throughout the globe, and its history extends more than 100 years. We are committed to protecting the environment and giving back to the communities where we live and work. In 2023, 95% of our revenue was from products categorized as either widely recyclable, regionally recyclable, or conditionally recyclable, and we continued to reduce our use of fossil-based plastic barrier materials through cup innovations using bio-based liners and barrier thickness reductions. We also recovered and recycled 1.1 million metric tons of waste materials in 2023, including 98% of our paperboard waste, from our packaging plants and paperboard manufacturing facilities. For the year ended 31 December 2023, our net sales were \$9.4 billion.

In the United Kingdom, Graphic Packaging employs 1628 full time employees across ten facilities, including locations in Bardon, Bristol, Gateshead, Highbridge, Huntingdon, Leeds, Newcastle, Rotheham, Sheffield, and Winsford. Our team is focused on maintaining efficient, safe and ethical working practices in a changing environment with constantly evolving products.

For more information about Graphic Packaging and our locations, please review our website at <https://www.graphicpkg.com/>

B. Our Supply Chain

In 2023, Graphic Packaging spent approximately \$6 billion with over 17,000 suppliers across our global operations. We operate an integrated global supply chain that includes suppliers of raw materials, energy, freight carriers, warehousing, and other goods and services. We choose suppliers and other third-party partners who share our commitment to operate responsibly, including prohibiting the use of child labour and all forms of Modern Slavery. We recognize that actions across our supply chain can positively or negatively impact a wide range of stakeholders through social, environmental, and economic avenues.

In early 2024, we hired a VP, Supply Chain Sustainability who will be driving efforts to engage suppliers, reduce value chain emissions, increase our purchases of renewable electricity, and enforce our human rights policies with our suppliers. In addition, we train global buyers annually on business ethics, anti-bribery awareness, preventing forced labour and child labour, export restrictions and other topics through our annual ethics training.

Our six North American paperboard manufacturing facilities produce unbleached paperboard, bleached paperboard and recycled paperboard. Our UK packaging plants consume paperboard supplied from our own paperboard manufacturing facilities in North America and convert other paperboard grades purchased from external suppliers mainly in the UK and continental Europe. We then convert the paperboard into our packaging solutions. We also sell paperboard to a wide variety of independent paperboard packaging manufacturers and brokers. In addition to paperboard, Graphic Packaging works with long-term suppliers also for sourcing of other main raw material key commodities such as printing inks, overprint varnishes, decorative materials, and packaging materials. We believe that these strong supplier relationships are the key to ensuring continuous improvement in supply chain working conditions.



II. CORPORATE GOVERNANCE AND POLICIES

A. Governance

Graphic Packaging’s Board of Directors oversee the global compliance strategy and objectives, including the Company’s activities and related risks relevant to human rights. The Board of Directors reviews all significant policies and commitments and reviews the overall compliance program and corporate risk assessment annually.

Graphic Packaging has a Compliance & Risk Committee (“CRC”) comprised of a broad-reaching team of compliance experts who manage the adequacy and effectiveness of its compliance risk management. Members of the CRC include the EVP, General Counsel; EVP, Human Resources; SVP, Chief Information Technology; SVP, Chief Audit, Risk and Compliance Officer; the VP & Assistant General Counsel -Labour & Employment; VP & Assistant General Counsel; VP, Legal (EMEA), and the VP, HS&E. Members of the CRC and their teams work very closely with the VP, Chief Sustainability Officer, the VP Procurement, and the VP Supply Chain Sustainability on third-party risk management and to ensure that all relevant policies, training, and initiatives comprising the human rights program are implemented throughout GPI’s supply chain to minimize the risk of forced labour and other human rights risks.

The VP, Chief Sustainability Officer leads the development and execution of the Company’s Environmental, Social & Governance (“ESG”) strategy and initiatives along with an interdisciplinary team of experts that includes senior leaders in Procurement, Legal, and Human Resources. This team engages with other stakeholders to review critical ESG issues and enhance the Company’s sustainability efforts.

B. Policies

Our **Code of Conduct** is the cornerstone of our compliance program, and addresses everything from the Company’s Core Values to how we conduct business, including but not limited to topics such as discrimination, harassment, anti-corruption, and human rights. To ensure compliance with the Codes of Conduct and ethical practices around the globe, all Graphic Packaging employees are trained on the Code of Conduct annually.

In addition to the Code of Conduct, several global policies have been established codifying Graphic Packaging’s efforts to ensure no modern slavery exists within our Company or supply chain. Many of these policies were revised in 2023.

Global Anti-Harassment and Anti-Discrimination Policy, Revised 2023	We do not discriminate based on national or ethnic origin, place of residence, gender, gender identity, sexual orientation, pregnancy, color, religion, ancestry, age, disability, marital status, genetic information, political affiliation, veteran/military status, and any other status protected by applicable law. This applies to anyone we employ, as well as anyone who applies for employment with us.
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Global Anti-Slavery and Human Trafficking Policy, Revised 2023	We do not knowingly engage in forced, compulsory, or bonded labour, and we do not threaten workers or restrict their movement.
Global Child Labour & Remediation Policy, Revised 2023	We do not employ workers in violation of any applicable national or local regulation governing age of employment. In addition, we do not employ workers in violation of the mandatory school age set by a country. For more details, see our policy prohibiting child labour.
Global Health and Safety Policy, Revised 2023	We are committed to providing a work environment that encourages and promotes wellness and safety for our employees, contractors, suppliers, visitors, and neighboring communities.
Global Human Rights Policy, Revised 2023	The Company strives to be a role model in the packaging industry regarding safe and responsible business conduct, a good corporate citizen, and a partner to all our stakeholders. It is committed to supporting and enforcing human rights by prohibiting child and forced labour; increasing and supporting diversity, inclusion, and community and stakeholder engagement; respecting employees' freedom of association; and ensuring employees have a safe and health working environment.
Global Supplier Code of Conduct, Revised 2023	We want to work with suppliers whose standards with respect to human rights align with our standards. Our goal is to eliminate human trafficking from our supply chain and to use only those products that do not finance or benefit armed groups in the Democratic Republic of Congo and nine adjoining countries.
Global Transparency in Supply Chains Act Declaration	The Company reports on our human rights practices annually through our ESG Report; U.K., Australia, and Canadian Modern Slavery Act Reports and Statements; California Transparency in Supply Chains Act Declaration; and Conflict Minerals Report.
Global Whistleblower Policy, Revised 2023	All Graphic Employees have an obligation to speak up and report conduct by a Company employee, supplier, visitor, or customer that they have a good faith belief violates a Company policy, including the Code of Conduct, or any law or regulation. The Company does not tolerate retaliation against employees who make a good faith report of such misconduct.



Graphic Packaging has been a participant to the UN Global Compact since 2021 and is committed to incorporating the 10 principles of the compact into its business operations. Our Code of Conduct, Human Rights Policy, Child Labour and Remediation Policy, and Global Supply Chain Code of Conduct encompass the international human rights principles set forth in the U.N. Guiding Principles on Business and Human Rights, the U.N. Universal Declaration of Human Rights and its two corresponding covenants, the International Bill of Rights, the U.N. Conventions on the Rights of the Child, and the U.N. Convention on the Elimination of Discrimination against Women. Graphic Packaging's approach to its business operations is informed by the OECD Guidelines for Multinational Enterprises, the ILO's 1998 Declaration on Fundamental Principles and Rights at Work, and the UNGC.

The above-referenced policies are available at our Disclosures & Company Policies section on our website and hold each of us at Graphic Packaging and our suppliers accountable to: maintain work environment that protects the human dignity of all; ensure all business and working relationships are never exploitive or corrupt; and provide the means to deal with situations in conflict with our policies. Graphic Packaging continually reviews and updates its policies in consultation with in-house and external experts.

III. ASSESSING AND MANAGING THE RISK

A. Identifying the risk

1. Social Responsibility Audits

Graphic Packaging conducts a tiered system of due diligence activities to identify risks and prevent human rights impacts across our global business operations. We use the Supplier Ethical Data Exchange (Sedex) platform, an online collaborative platform that allows us to conduct periodic, online self-assessments and, every three years, to complete a social responsibility Sedex Member Ethical Trade Audit (SMETA) to ensure compliance with applicable local, state, or national/regional requirements, as well as Graphic Packaging policies. As we acquire new packaging facilities, we add them to the program and work to complete the SMETA within the first two years after purchase. We currently conduct SMETAs at packaging locations and are evaluating including paperboard facilities, machinery facilities, corporate offices, and R&D facilities in the program. All audits are conducted by a Sedex approved, independent third-party auditor.

Sedex has developed a rigorous four-pillar framework that assesses a site based on the organization's standards for labour, HSE, and business ethics. We use the Sedex RADAR risk assessment tool to screen countries where we have core business operations. The tool combines country- and sector-level risk data based on independent and reputable sources to assess the 14 risk topics defined under the four Sedex pillars, including human and labour rights risks (e.g., forced labour, human trafficking, child labour, freedom of association, right to collective bargaining, equal remuneration, and discrimination). Country risk indicators are drawn from publicly available sources and are chosen according to their coverage, reliability, comparability, and relevance.

As part of our 2025 sustainability goals, Graphic Packaging committed to conducting human and labour rights due diligence assessments and set a goal that 100% of global packaging facilities would be in compliance with a social responsibility compliance audit by 2025. At year-end 2023, 87% of packaging facilities were compliant with completing their third-party SMETA on schedule. The 2023 compliance rate is similar to 2022 (87%). Although social responsibility is not part of our new 2030 sustainability goals, the 2025 goal had its desired impact and social responsibility self-assessments and audits across our



operations are now integrated in our management systems. Even though we are sunsetting the goal, we will continue reporting on our actions and progress upholding human rights in our operations and value chain.

2. Acquisition Due Diligence

When evaluating a potential target for acquisition, Graphic Packaging engages in a vigorous due diligence process that includes an assessment of human rights risks. The human rights assessment includes a review of relevant policies, analysis of major supply chain agreements and relationships, and assessment of immigration and employment verification processes. Following acquisition, employees are onboarded into Graphic Packaging as soon as possible and screened to ensure they are legally able to work. Newly acquired employees are also immediately provided with copies of our Code and access to our global Alertline for filing grievances and complaints. This process was applied in the acquisition of the three Bell locations in the United States in 2023.

3. Reporting Mechanisms

Employees, suppliers, and customers may contact a local or regional human resources representative; our legal, internal audit or compliance departments; or our confidential, 24-hour Alertline to ask questions about our human rights policy or report concerns. The Alertline is maintained by a third-party provider, and complaints may be made online or via country-specific toll-free telephone numbers. All complaints or inquiries are assigned to members of the Company's Internal Audit, Legal, Human Resources, or Employee Relations departments and promptly investigated. Investigations must be completed in 10, 15 or 20 business days; depending on severity. All key stakeholders are informed about the outcome of the investigations and any related corrective actions. The Company does not tolerate retaliation for reporting a complaint on the Alertline, and anonymous reports are welcome.

Employees are informed about the Alertline through postings in our facilities, the Code of Conduct, Global Whistleblower Policy, the Company Intranet, and other policies. They also receive information about filing complaints via the Alertline during annual compliance training and occasional notices. Suppliers are notified about the availability of the Alertline via the Company's public website and the Global Supplier Code of Conduct. Employees who fail to report a violation of the Company's policies, including but not limited to the prohibition against forced labour, human trafficking, and child labour, are subject to discipline, up to and including termination.

B. Managing and Mitigating the Risk

1. Internal Operations at Risk for Child Labour or Modern Slavery

Most Graphic Packaging employees are employed directly by the Company and their terms and conditions of employment are governed by local, provincial, or national laws. However, we respect the rights of employees to determine whether they will be represented by a collective bargaining representative and believe that employees should exercise those rights in an informed manner based upon the free exchange of information. Approximately 57% of our global employees were represented by elected collective bargaining agents in 2023 and had active collective bargaining agreements providing for their terms and conditions of employment. In addition, the Company's legal and human resources experts ensure that all employment policies and practices are updated regularly in compliance with



applicable laws and regulations. Contingent workers are engaged via reputable agencies with whom we have contractual agreements that provide us with the right to audit certain employment practices to ensure legal compliance.

Graphic Packaging regularly reviews and updates its Child Labour and Remediation Policy, most recently in 2023. The Company prohibits the employment of anyone under the age of 15, and individuals ages 15 to 17 are prohibited from working in positions that would expose them to hazardous work or materials. We require legal proof of age at time of hire and maintain copies of these documents in our local HR management systems. Original employee documents are returned to employees. Graphic Packaging supports all forms of legal youth employment, including the development of legitimate workplace apprenticeship and internship programs for youth. We have controls in place, and, to our knowledge, no Graphic Packaging operations face significant risks of child labour.

The Company complies with applicable laws prohibiting all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery, and any form of human trafficking. We do not collect and retain employees' legal personal identification documents, withhold wages, allow debt bondage practices, nor do we attempt to control or restrict employee movements. We have controls in place and to our knowledge none of the Company's operations have risks of forced or compulsory labour.

Graphic Packaging continues to monitor employee concerns by conducting regular employee engagement surveys and investigating all concerns raised through its 24-hour, toll-free Alertline. In 2023, we conducted Alertline training and awareness sessions with all global human resources and safety representatives. Furthermore, all Alertline reports made in 2023 were investigated, where possible, within the reporting requirements and where applicable, appropriate corrective action was taken. For total investigated cases, 24% were substantive with 20% of those matters substantiated (in whole or in part), and the remainder were either unsubstantiated or unrelated to policy violations.

In 2023, the Highbridge and Rotherham facilities were subjected to SEDEX audits, during which no human rights violations were noted.

2. Supply Chain

We set expectations for our suppliers, through our Global Supplier Code of Conduct, to similarly respect human rights, and we explicitly prohibit the use of forced or compulsory labour. The Global Supplier Code of Conduct is made available to all suppliers through our website, and we include compliance with the Global Supplier Code of Conduct in contracts for our North America and Europe suppliers. We train our salaried employees to detect modern slavery and forced or compulsory labour risks via our annual compliance training program. We also use a sustainability and risk intelligence tool, which scrubs vendors for Modern Slavery (powered by the Global Slavery Index, Social Hotspot Database, Dow Jones), Sanctions (powered by Dow Jones), and Adverse Media (Dow Jones Media), to vet and monitor our suppliers for forced or compulsory labour risks and adverse media concerns. In 2023, our third-party risk management program completed sanctions, adverse parties, and human slavery screening of over 8,000 vendors.



3. Training and Awareness

Graphic Packaging recognizes that the management of human rights risks, including Modern Slavery, requires the continuous capability building and raising awareness of teams across the Company. We use technology to advance the learner experience. We offer compliance training initiatives, hourly technical training, and leadership development components. In 2023, 84% of our salaried employees participated in over 30,000 courses and videos through our GPI University program. In 2023, 91% of Graphic Packaging's global salaried employees completed a training on our Code of Conduct where they were reminded of our Core Values, Human Rights policy, and our policies prohibiting discrimination and harassment. We also ensure our employees are able to identify the early signs of human rights abuses and Modern Slavery in our business and supply chain by providing targeted Modern Slavery training to our salaried employees. Our global training rates were slightly lower in 2023 versus prior years due to systems integration challenges primarily outside the Americas. These issues are being addressed.

IV. EFFECTIVENESS IN PREVENTING MODERN SLAVERY

For the year 2023, Graphic Packaging did not identify any risk of modern slavery in its operations, and it identified the risk of modern slavery in its supply chain as low. There were no reported incidents of forced or compulsory labour in our operations or supply chain in 2023. Likewise, there were no identified incidents of child labour in our operations or supply chain in 2023. Hence, no remediation efforts were necessary.

V. LOOKING AHEAD

Graphic Packaging is making great strides to improve our initiatives pertaining to the eradication of modern slavery, as reflected in the myriad of new and updated policies and procedures reflected in this report, our increased usage of the Sedex platform for self-assessments, and the implementation and use of other risk assessments.

Our goal is to be Better, Every Day. We will do this by continuing to update our policies and procedures to comply with applicable ethical and legal requirements pertaining to our operations and supply chain. In addition, the Company intends to expand our compliance training to provide anti-discrimination and harassment training to hourly employees outside the United States and to provide additional information about sustainability, human rights and general social responsibility to all employees. We also plan to increase our scrutiny and assessment of suppliers in our supply chain across the globe to ensure that they comply with our Core Values of Integrity, Respect, Accountability, Teamwork, and Relationships.



This report was approved by the Boards of Graphic Packaging International Bardon Limited, Graphic Packaging International Limited, Graphic Packaging International Gateshead Limited, Graphic Packaging International Europe UK Limited, Graphic Packaging International Foodservice Europe Ltd, GPI Cambridge Ltd, GPI Highbridge Ltd, and GPI Rotherham Ltd.

Signed



Lauren Tashma

Executive Vice President, General Counsel and Secretary



Innovation

Build the leading sustainability-focused consumer packaging innovation platform



Culture

Enable a safe, inclusive, customer-focused culture



Planet

Steadily and measurably improve the environmental footprint of consumer packaging



Results

Consistently execute for customers, shareholders and all stakeholders

