



## California Transparency in Supply Chains Act — Declaration

Graphic Packaging International, Inc. (GPI) is dedicated to conducting business in a lawful and ethical manner. It is our expectation that our suppliers also conduct themselves in such a manner. We comply with laws regarding slavery and human trafficking in the countries in which we do business and expect that our direct suppliers also comply with such laws. Accordingly, we consider these rights issues when we assess potential suppliers. Our supplier guidelines state that our suppliers must not use any form of forced, bonded, indentured or prison labor, that all work must be voluntary, that workers should be free to terminate their employment, and that child labor is strictly prohibited.

While GPI does not have a formal supplier verification program with third party auditors, it does require its suppliers to be in compliance with its supplier guidelines. GPI's employees who engage suppliers, vendors, or individual contractors to work on behalf of GPI brief them on the supplier guidelines. GPI also requires direct suppliers to make a certification regarding materials incorporated into their products. GPI investigates suspected cases of non-compliance and may terminate contracts when a serious breach is found to have occurred.