

Anti-Harassment and Anti-Discrimination Policy (Global)

Purpose

Graphic Packaging's Core Values include Respect—for the personal dignity, rights, and diversity of every employee. The Company is committed to fostering and inspiring an innovative and inclusive working environment where employees are respected, and they feel engaged and safe. This Anti-Harassment and Anti-Discrimination Policy details how Graphic Packaging provides all employees with a respectful working environment that is free of all forms of unlawful discrimination, harassment, and retaliation and that provides them with the opportunity to perform and develop to the best of their abilities.

Scope

This Policy applies to all applicants, employees, contractors, interns, suppliers, customers, and visitors of all Graphic Packaging legal entities worldwide. For the purpose of this Policy, "workplace" includes manufacturing facilities, sales and research and development offices, warehouses, any settings employees visit or attend while carrying out their job responsibilities and duties or representing the Company, including but not limited to work-related social events, customer sites and entertainment events, modes of transportation provided by Graphic Packaging for work-related travel, and any other location where Graphic Packaging business is being conducted, or which can be reasonably regarded as an extension of the workplace.

This Policy applies to physical conduct and actions as well as all forms of communication including, but not limited to, in-person communications, telephonic exchanges, email, social media applications and sites, text messages, and other types of electronic communications. Employees should refer to the Company's Social Media Policy for additional guidelines concerning those communications.

This Policy may be supplemented by local policies containing additional requirements or setting forth specific local procedures regarding the handling of investigations. Where this Policy conflicts with an applicable collective bargaining agreement or law, the latter will prevail. The Company reserves all rights available to it under applicable law.

Definitions

Discrimination is the unfair denial of equal treatment and opportunity to individuals or groups based on the characteristics listed below with respect to the terms, conditions, or privileges of employment, including but not limited to, hiring, firing, promoting, disciplining, scheduling, training, or compensation:

- Race, color, ethnicity, or national origin;
- Age;
- Religion or religious beliefs;
- Sex, sexual orientation, or pregnancy/childbirth and related medical conditions;
- Gender, gender identity, gender status, or gender expression;
- Nationality, immigration status, citizenship, or ancestry;
- Protected Military or veteran status;
- Physical or mental disability, medical condition, genetic information, or characteristics; and
- Marital status

This list is not exhaustive of all categories protected from discrimination and may be supplemented by applicable local laws or regulations.

Harassment is unwelcomed and degrading, abusive, intimidating, or hostile verbal or physical conduct including comments, actions, or gestures that affect an individual's dignity or psychological or physical integrity. Harassment can take many forms, such as physical touching, violence, a threat of violence, offensive violence, inappropriate teasing or joking, and displaying offensive images. A single incident or statement or a pattern or series of acts, incidents, or statements may constitute harassment under this Policy. By way of illustration only, and not limitation, such prohibited harassment includes:

- racial or ethnic slurs, epithets, and any other offensive remarks;
- jokes, whether written, verbal, or electronic;
- threats, intimidation, and other menacing behavior;
- inappropriate verbal, graphic, or physical conduct;
- harassing messages or videos sent via text, instant messaging, or social media; and
- other harassing conduct based on one or more of the protected categories identified in this Policy.

Victims of harassment can be of the same or different sex, sexual orientation, race, or other characteristics as the harasser.

Sexual Harassment is harassment specifically based on sex, gender, gender identity or expression, or sexual orientation that is unwelcome as well as degrading, abusing, intimidating, or hostile. Conduct may be considered sexual harassment even when it is not motivated by sexual desire. By way of illustration only, and not limitation, some examples of unlawful and unacceptable behavior include:

- unwanted sexual advances;
- offering an employment benefit (such as a raise, promotion, or career advancement) in exchange for sexual favors, or threatening an employment detriment (such as termination or demotion) for an employee's failure to engage in sexual activity;
- visual conduct, such as leering, making sexual gestures, and displaying or posting sexually suggestive objects or pictures, cartoons, or posters;
- verbal sexual advances, propositions, requests, or comments;
- sending or posting sexually related messages, videos or messages via text, instant messaging, or social media;
- stalking;
- verbal abuse of a sexual nature, graphic verbal comments about an individual's body, sexually degrading words used to describe an individual, and suggestive or obscene letters, notes, or invitations;
- physical conduct, such as touching, groping, assault, or blocking movement;
- physical or verbal abuse concerning an individual's gender, gender identity or gender expression; and
- verbal abuse concerning a person's characteristics such as pitch of voice, facial hair or the size or shape of a person's body, including remarks that a man is too feminine, or a woman is too masculine.

Policy

General Prohibition

The Company prohibits all forms of discrimination and harassment based on the characteristics provided above. It is the responsibility of all employees to report harassing or discriminating behavior. The Company will take necessary action to investigate and address incidents that may constitute discrimination or harassment in a timely manner and in accordance with applicable laws and regulations. Substantiated cases of discrimination or harassment will result in corrective action up to and including termination, considering all circumstances and applicable laws and regulations.

Consensual Relationships

This Policy does not prohibit private, consensual romantic relationships between employees. However, if a private, consensual romantic relationship creates a possible conflict of interest (e.g., the parties are in the same reporting structure) the relationship should immediately be disclosed in accordance with the Company's Conflicts of Interest Policy (Global). Additionally, it is possible to harass or discriminate against a partner in an otherwise consensual romantic relationship.

Reporting Suspected Violations of this Policy

Every individual subject to this Policy has the responsibility to bring concerns about suspected discrimination or harassment to the Company's attention so that the situation at issue can be addressed. The Company takes all complaints of discrimination and harassment seriously.

Anyone who believes they have been harassed in the workplace or who witnesses or learns about any action that could be viewed as harassment should report the conduct immediately to one of the following:

- A local or assigned human resources representative.
- A regional or divisional human resources representative or another member of human resources in their country or region.
- The executive vice president of human resources at EVP-HumanResources@graphicpkg.com.
- The Graphic Packaging Business Conduct Alertline at www.gpibusinessconductalertline.ethicspoint.com or via the toll-free telephone number for their country. The Graphic Packaging Alertline is available 24 hours per day. Reports may be made anonymously if the reporter chooses.

Country-specific Business Conduct Alertline telephone numbers:

Australia	1800565761	Italy	800 725 944
Austria	0800 017868	Japan	0800-700-9401
Belgium	0800 77 076	Mexico	800 681 6714
Brazil	0800 000 0572	Netherlands	0800 0229398
Canada	1.866.898.3750 1.855.350.9393	New Zealand	0800 426 361
China	400 120 3531	Nigeria	0-708-060-1816, then 866-898-3750
Croatia	800-528-422	Norway	80062436
Estonia	8000044232	Poland	800005072
Finland	800416130	Russia	8 (800) 301-85-89
France	0.800.90.2500	South Korea	<i>forthcoming</i>

Germany	0800 1810751
Greece	0.080.012.6576
Indonesia	0800 1401907
Ireland	1800 851 822

Spain	900.991.498
Sweden	020-088 00 16
Switzerland	0800 000 329
United Kingdom	0800 048 5494
United States	1.866.898.3750

Managers and supervisors: All managers and supervisors are responsible for preventing harassment and discrimination in the workplace as part of their job duties and are required to report any discriminatory or harassing behavior they observe or complaints they receive to human resources or the Graphic Packaging Business Conduct Alertline immediately. Managers or supervisors who are aware of discrimination or harassment and take no action to stop or report the behavior to Human Resources or the Graphic Packaging Business Conduct Alertline may be subject to discipline.

Investigations and Confidentiality

All reports of suspected discrimination or harassment will be investigated in an objective and timely manner. All employees are expected to cooperate with investigations taken pursuant to this Policy. Failure to cooperate in an investigation may result in disciplinary action. Further, given the serious nature of discrimination and harassment, making a report or complaint in bad faith or with malicious intent will result in discipline.

The Company will keep all reports of suspected discrimination or harassment confidential to the extent reasonably practical while still fulfilling its obligation to investigate and end any harassing, discriminatory, or retaliatory conduct. It may be necessary to discuss the claims with the person(s) with knowledge and the person(s) against whom the report or complaint is made.

It is necessary to collect personal data during the investigation of suspected discrimination or harassment as evidence of the validity or invalidity of the facts at issue. The Company will abide by all applicable laws and regulations pertaining to the protection of personal data. Personal data of the persons involved in an investigation will be processed by the human resources and law departments of the Company only for the purposes of investigating the reported conduct and will be communicated only to those who need to know about the reported conduct as well as to any public, administrative, or judicial authority as required.

If necessary, corrective action appropriate to the investigation's findings will be taken. Possible corrective action may include, but is not limited to, training, coaching, verbal or written warnings, suspension, demotion, compensation adjustments, and termination. The Company will make every effort to inform those reporting violations of this Policy of the outcome of the investigation when feasible while maintaining confidentiality and privacy concerns pertaining to personnel actions.

No Retaliation

The Company is committed to prohibiting retaliation against those who themselves or whose family members report, oppose, or participate in an investigation of alleged wrongdoing in the workplace. By way of example, participating in an investigation, includes, but is not limited to:

- Filing a harassment complaint;
- Participating in or cooperating in an investigation regarding a complaint of harassment;
- Testifying as a party (whether as accuser or accused) or witness regarding alleged unlawful activity;
- Making or filing an internal complaint with the Company regarding alleged unlawful activity;
- Providing informal notice to the Company regarding alleged unlawful activity; and

- Assisting another employee who is engaged in any of these activities.

The Company is further committed to prohibiting retaliation against qualified employees who request a reasonable accommodation for any known physical or mental disability and employees who request a reasonable accommodation of their religious beliefs and observances.

Anyone who believes that they are being retaliated against, or who observes retaliation by or against another person, should immediately contact Human Resources or the Graphic Packaging Business Conduct Alertline.

Graphic Packaging, at its sole discretion, reserves the right to amend or modify this Policy at any time and for any reason.