

## MODERN SLAVERY ACT TRANSPARENCY STATEMENT

### FOR THE FINANCIAL YEAR ENDING 2016

#### Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps undertaken by Graphic Packaging International Bardon Limited, a subsidiary of Graphic Packaging International, Inc. and other relevant GPI group companies<sup>1</sup> (“GPI”, the “Group”, the “Company”, “we” or “our”) during year ending 2016 to ensure that slavery, servitude, forced or compulsory labour and human trafficking (“Modern Slavery”) is not occurring within our business or supply chains.

#### Our Business and Supply Chains

As a leader in packaging design and innovation that serves hundreds of the world’s most recognized brands in the food and beverage markets, GPI has a responsibility to be alert to the risks, however small, in our business and in our supply chains. We have a zero-tolerance approach to Modern Slavery and work with our customers and suppliers in a manner that reflects a strong sensitivity and concern for social responsibility and ethical dealings. The Group is committed to fair labor practices and prohibits the use of all forms of forced labor and any form of human trafficking. We are dedicated to driving transparency, creating sustainable value for our stakeholders and ensuring that our employees can develop and realize their full potential.

#### Our Relevant Policies

We have implemented a number of policies in keeping with our commitment to act ethically and with integrity in all of our business dealings and relationships. The [Code of Business Conduct and Ethics](#) applies to GPI’s subsidiaries and affiliates across the globe and is based on Group’s core values. It outlines the principles, policies, and laws that guide all employees’ activities and demonstrates GPI’s commitment to human rights and fair labor practices.

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<sup>1</sup> This statement sets out the steps taken under section 54 of the Modern Slavery Act 2015 by the following Graphic Packaging International, Inc. subsidiaries: Graphic Packaging International Bardon Limited, Graphic Packaging International Limited, Graphic Packaging International Gateshead Limited and Graphic Packaging International Europe UK Limited.

In line with GPI's commitment to uphold human rights as part of its corporate culture, the Company is aiming at using only such products that do not finance or benefit armed groups in the Democratic Republic of Congo and nine adjoining countries. As described in GPI's [Policy Statement on Conflict Minerals](#), we expect our suppliers to cooperate in providing information to confirm that the conflict minerals in our supply chain are "conflict free."

We are committed to ensuring that people are treated fairly and with dignity and respect throughout the Company. Our hiring, training, compensation, and other employment practices are free from discrimination and these practices are described in a detailed way in our global **Equal Employment Opportunity Policy**. We prohibit workplace harassment and cannot tolerate bullying, intimidation, or any conduct that may be considered harassment or lead to harassment or creates a hostile environment for anyone. Guidelines for such behavior and how it can be reported are provided in our global **Anti-Harassment Policy**.

In addition to GPI's **Human Rights Policy**, in 2016 GPI has been in the process of developing an **Anti-Slavery and Human Trafficking Policy**, which will be implemented by the end of June 2017. This policy has been designed to provide transparency in our business and highlight our commitment to ensuring that Modern Slavery does not occur throughout our supply chains. It identifies the responsibilities of the management in relation to the policy and lists the actions for raising any questions or for reporting suspected cases of Modern Slavery by employees and external to the Group people.

Other policies reflecting GPI's pledge to acting ethically and with integrity in all our business relationships include:

-  **Anti-Bribery & Corruption Policy**
-  [California Transparency in Supply Chains Act Declaration](#)
-  [Worldwide Policy for Health, Safety & Environmental](#)

## Due diligence

GPI expects its suppliers to respect human rights, including maintaining policies and procedures to prevent Modern Slavery in their business and supply chains. In order to ensure that suppliers in GPI's supply chains comply with our ethical standards, we have developed a **Supplier Questionnaire** in Europe. Our preliminary assessment is focused on our critical suppliers. To outline GPI's sustainability expectations and to communicate those to our critical suppliers we are also in the process of updating our **Ethical Sourcing Policy**. Our suppliers in the United States need to be in compliance with GPI' **Supplier Guidelines**. Company's requirements with respect to human rights, prevention of involuntary labour, employee health and safety and environmental performance are also referenced in tender documentation. GPI's employees who engage suppliers, vendors, or individual contractors to work on behalf of GPI brief them on

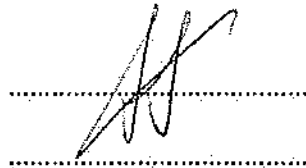
the Supplier Guidelines. In pursuit of our goals to act in a responsible and ethical manner in Company's dealings, we also utilize the online supplier management platform SEDEX to identify, verify and manage risks within our supply chains.

### **Education and Trainings**

We believe that it is our duty to continue increasing our focus on and raising awareness of the important issue of Modern Slavery. GPI employees are required to undertake regular training on Antitrust, the Company's Code of Business Conduct and Ethics and the Anti-Bribery & Corruption Policy to ensure they are aware of the continued need for high levels of corporate responsibility in their day-to-day work. Additional training courses focusing on Modern Slavery and on other human rights issues will be provided as necessary throughout the Group. Employees are also actively encouraged to raise and report any issue of concern to the Legal Department via a designated email.

This statement was approved by the Boards of Graphic Packaging International Bardon Limited, Graphic Packaging International Limited, Graphic Packaging International Gateshead Limited and Graphic Packaging International Europe UK Limited.

Signed



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*Hilde Van Moeseke*  
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