

POLICY STATEMENT ON CONFLICT MINERALS

Graphic Packaging Holding Company (“Graphic Packaging”) is committed to upholding human rights as part of our corporate culture. As part of this commitment, Graphic Packaging supports the efforts of human rights organizations to end the violence and atrocities fueled by the sale of gold, cassiterite, columbite-tantalite and wolframite (along with their derivatives tin, tantalum and tungsten) originating from the Democratic Republic of Congo and the nine adjoining countries (“Conflict Minerals”).

In 2012, the Securities and Exchange Commission (the “SEC”) approved Section 13(p) of the Securities and Exchange Act, as amended, and Rule 13p-1 promulgated thereunder regarding the sourcing and use of Conflict Minerals. Rule 13p-1 requires publicly-traded companies to report annually to the SEC whether the products they manufacture or contract to manufacture contain tin, tantalum, tungsten or gold (known collectively as “3TG”), require the use of 3TG in the production process, and whether such 3TG originate in the Democratic Republic of Congo and the nine adjoining countries. Graphic Packaging is committed to complying with Rule 13p-1 and providing reports detailing our efforts with respect to Conflict Minerals to our stakeholders and the public.

Graphic Packaging’s goal is to use only those 3TG that do not directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo and nine adjoining countries. These 3TG are referred to herein as being “conflict free.” To achieve this goal, Graphic Packaging will exercise due diligence with its suppliers consistent with the framework set forth in the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Mineral from Conflict-Affected and High-Risk Areas. Graphic Packaging expects our suppliers to cooperate in providing information to confirm that the 3TG in our supply chain are conflict free. Graphic Packaging strongly prefers to purchase from suppliers who will certify that their products do not contain 3TG or, if their products do contain these minerals, that they are conflict free. Accordingly, Graphic Packaging will, where feasible, purchase only from those suppliers who can certify that their products do not contain 3TG or that the 3TG used therein are conflict free.