

Anti-Counterfeiting and Anti-Illicit Trade Policy (Global)

Purpose

Graphic Packaging takes product authenticity seriously and recognizes that counterfeiting and illicit trade are serious problems to businesses worldwide. This Policy regulates how Graphic Packaging manages activities related to potential counterfeiting and illicit trade.

Scope

This Policy applies to the commercial activities of Graphic Packaging and its affiliates and subsidiaries (collectively, "Graphic Packaging" or the "Company"). The policy also applies to Graphic Packaging's agents (including employees and contractors) and business partners (suppliers, vendors, service providers, and customers).

Definitions

- **Illicit trade** is any production, import, export, purchase, sale or possession of goods that does not comply with applicable law.
- **Contraband** describes genuine products smuggled across international borders.
- **Counterfeit** describes fake products appearing to be from a genuine brand.

Policy

The Company prohibits its agents from selling packaging materials to any third party with knowledge or belief that such packaging materials will be used for packaging contraband or counterfeit products, or otherwise used in illicit trade channels.

Graphic Packaging uses its best efforts to confirm that all its customers are neither using nor intending to use Graphic Packaging products in the manufacture, sale, or distribution of counterfeit products. Such efforts include:

- Conducting reasonable due diligence to confirm that a prospective customer is a legitimate business entity and intends to use Graphic Packaging products for legitimate purposes.
- Using commercially reasonable efforts to confirm that existing customers are not engaged, directly or indirectly, in the manufacture, sale or distribution of counterfeit products.
- Making appropriate inquiries to confirm that the quantity of product ordered by a customer is a reasonable amount for the scale of such customer's business.

Further, Graphic Packaging uses its commercially reasonable efforts to confirm that its suppliers, vendors, and service providers do not engage in the manufacture, sale, or distribution of counterfeit or other illegal trade products by performing due diligence during the Company's vendor onboarding procedures.

Graphic Packaging will not knowingly engage in business with business partners who have been convicted, or are otherwise shown through verifiable evidence, of engaging in the manufacture, sale, or distribution of counterfeit products. Graphic Packaging reserves the right to immediately suspend or terminate relationships and agreements with business partners if such illegal activities are discovered.