

California Transparency in Supply Chains Act of 2010 (SB 657)

Graham Packaging Company, L.P. (“Graham”) endeavors to eradicate slavery and human trafficking from its direct supply chain. In order to do so, we engage in supply chain audits, require certifications from our suppliers, maintain internal procedures and provide training to employees. Specifically, in order to ensure compliance Graham performs the following functions.

1. Graham engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery.
 - a. This is performed through certification by vendors and audits.
 - b. Verification is performed by Graham, not a third party.
2. Graham conducts audits of suppliers to evaluate supplier compliance with company standards for human trafficking and slavery in supply chains.
 - a. These audits are independent but are not unannounced.
 - b. Audits are conducted both on-site with the vendor and off-site.
3. Graham requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.
 - a. Certifications are forwarded to vendors in our direct supply chain for products Graham sells.
4. Graham maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and human trafficking.
 - a. Graham maintains a Social Accountability and Ethical Treatment Policy placing employees on notice of prohibitions with respect to slavery and human trafficking in our supply chain.
 - b. Violation of the aforementioned policy may result in disciplinary action, including possible termination.
5. Graham provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.
 - a. Training is provided to those employees responsible for supply chain management.