



Corporate Social Responsibility Commitment to Human Rights

Background and Guiding Principles

Graham Packaging is an industry leading solutions provider for sustainable packaging and a worldwide leader in the design, manufacture and sale of technology-based, customized blow-molded plastic containers for a variety of branded markets, including food and beverage, household and automotive lubricants.

As a responsible company that strives to be a good corporate citizen, we continue to develop safety initiatives and recognition, integration through multi-cultural approaches, gender equality as well as integral Corporate Social Responsibility (CSR). At Graham, we believe and operate under the guiding principle that a socially responsible corporation is one that runs a profitable business that takes account of all the positive and negative environmental, social, and economic effects it has in society.

At Graham Packaging, CSR, including human rights, is endorsed and ingrained at the highest level in our company. The general obligation of each and every Graham Packaging employee to respect human rights is defined in the Graham Packaging Code of Ethics Policy. Specific Human Rights topics are governed and managed by issue and function-specific standards in Graham Packaging that have a binding character in the respective function or area of responsibility. Our CSR Guidelines provide overall guidance on governance, roles and responsibilities, and management of corporate responsibility.

Graham Packaging strives to promote and positively support internationally proclaimed human rights. To this end, we commit to respect human rights as set out in the United Nations Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as adhere to the principles set out in the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights and the International Finance Corporation's Performance Standards.

General Rights and Obligations

Non-Discrimination

Graham Packaging is committed to ensuring equal employment opportunity. All employment decisions, policies and practices are non-discriminatory.

Graham Packaging will not engage in or tolerate unlawful discrimination (including any form of unlawful harassment or retaliation) on account of a person's sex, pregnancy, age, race, color, religion, creed, national origin, ancestry, citizenship, immigrant status, military status, veteran's status, mental or physical disability, atypical heredity cellular or blood trait, genetic information, sexual or affectional orientation, gender identity, marital status, family status, domestic partner or civil union status, the use of a guide or support animal because of a physical or mental disability or membership in any other protected group.

Graham Packaging's policy on equal employment opportunity supports and is consistent with the Company's commitment to enhancing diversity and inclusiveness. Diversity means not only membership in the various "protected groups" identified above but also diversity in experience, perspective, ideas, style and contacts. We believe that we are much stronger as a Company as a result of the richness of our diversity and strive to ensure that we have policies and practices that are respectful of diversity and promote inclusion.

All complaints will be investigated promptly, and the existence and nature of such complaint will be disclosed only to the extent necessary to make a prompt and thorough investigation or as may be necessary to take appropriate corrective

measures. Graham Packaging will neither engage in nor tolerate any form of unlawful retaliation against any person for making a complaint alleging unlawful discrimination, harassment, retaliation, failure to reasonably accommodate, serving as a witness or otherwise participating in the investigatory process.

Labor Conditions and Working Hours

Graham Packaging does not engage in forced, compulsory, bonded or child labor.

Forced or compulsory labor means work or services extracted from persons under the threat of non-contractual penalty; and work or services which such persons have not voluntarily offered to perform.

Bonded labor means work or services extracted under economic conditions that leave employees without reasonable choice as to whether they want to continue to perform the work or service.

The absolute minimum age for employment is the higher of 15 years of age or the age at which compulsory schooling is no longer required by law. Wherever feasible, employees below 18 years should be employed as trainees or apprentices whose work is part of a regulated training scheme.

Working hours, excluding overtime, shall not exceed 48 hours per week.

Overtime must be used responsibly, taking into account all of the following factors: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate.

The total hours worked by an employee in any 7-day period shall not exceed 60 hours, except under certain circumstances, including but not limited to when allowed by national law, when allowed by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce, appropriate safeguards are taken to protect the workers' health and safety, and/or there is a demonstrated exceptional circumstance that applies such as unexpected production peaks, accidents or emergencies.

Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Accumulation of overtime and holiday entitlements is handled consistently with local law and procedures.

Re-integration after leaves of absence, illness or disability is facilitated with care management concepts, adapted work places and working conditions in line with local laws and regulations.

All Graham Packaging workers and employees have the option to leave employment within lawful contractual terms and the right to be provided with the proper documentation of their working relationship with Graham Packaging.

Fair and Competitive Wages

Graham Packaging is proud to provide you with pay and benefits that are competitive with those of similar companies in our industry, excellent working conditions, fair treatment and job security that comes from a strong company.

Our compensation principles are structured to encourage accountability and underline the importance of competence and integrity as drivers of sustainable business success. Graham Packaging pays wages for its employees which exceed what is needed to cover basic living needs, and monitors these defined living wages on a regular basis.

Freedom of Association

Graham Packaging recognizes that it is the legal right of employees to engage in union activity and to form unions. That being said, Graham Packaging's position on unions is further described in its Union Free Philosophy while recognizing and respecting the legal rights of employees based on local laws and regulations. We commit to constructive dialogue with workforce representatives, and to the involvement of work councils or trade unions. Graham Packaging acknowledges each

associate's entitlement to freedom of opinion, expression and speech, consistent with our policies and standards of respectful behavior.

We value an open and fair culture and are committed to cultivating an environment where everyone feels comfortable about expressing opinions and contributing ideas.

Health and Safety

Graham Packaging is committed to providing a safe and healthy work environment for our employees, customers and general public. The prevention of occupational injuries and illnesses is a core value of the organization.

Our guiding safety policy is based on these basic principles:

- All injuries and occupational illnesses are preventable.
- We will strive for an injury-free workplace, are never satisfied when injuries occur, and take the required action to prevent them.
- All construction and operating exposures can be reasonably safeguarded.
- For all jobs in which there may be a significant safety hazard, Graham Packaging management will conduct risk analyses, determine safe work practices, develop safe operating procedures, and take necessary actions to minimize risk to workers.
- Safety supersedes cost, quality and productivity.
- Graham Packaging's daily business decisions give safety equal consideration to other business criteria.
- Safety is never compromised in order to meet productivity deadlines and/or other business demands.
- Working safely is an essential element of employee performance, and a condition of employment.
- All Graham Packaging employees have a responsibility to work safely, report injuries immediately, and participate in accident and incident investigations.
- Individuals are held accountable for conducting themselves in a way that their actions or inactions do not cause injury to themselves, their coworkers or the general public.
- Safety is a line management responsibility.
- All Graham Packaging managers and supervisors are responsible and are held accountable to provide a safe and orderly working environment for their employees.

Education

Graham Packaging encourages employees with personal and professional development opportunities to further their education for the dual purpose of self-development and increasing their contribution to the growth of Graham Packaging.

The Education Assistance Program is available for eligible employees to obtain additional education or training through participation in courses of study at accredited colleges and universities and organizations specializing in job and career-related education and training in order to increase their competence in their present jobs and to prepare for future advancements within Graham Packaging.

Employee Assistance Program

Personal issues, planning for life events or simply managing daily life can affect employees' health and family. As such, Graham Packaging has selected an Employee Assistance Provider (EAP) service to provide these benefits to our employees. The EAP provider is staffed with trained professionals to assist employees twenty-four (24) hours a day. The service is confidential and employees will not be charged for these services.

Right to Security of Persons

Graham Packaging protects personnel and assets and provide a secure environment in which business operations can be successfully conducted. Our guidelines and management processes on security in our areas of operations align with our commitment to international human rights norms, as well as the laws and professional standards of the country or countries in which they operate.

Respect of Local Communities

Graham Packaging respects the rights of local communities affected by Company activities and the rights of Indigenous Peoples and communities consistent with international human rights standards.

Supplier Management

Graham Packaging expects our suppliers and contractors to respect human rights, align with applicable international standards and adhere to the spirit and intent of our commitment to human rights, as well as our statements and guidelines relating to Indigenous Peoples, human rights defenders, land tenure and water. We also engage with our key suppliers to reinforce awareness of potential human rights issues.

Effective February 22, 2021

A handwritten signature in blue ink, appearing to read "RDP".

Robert D. Pyle
Chief Executive Officer