



Control No: GSC 102

Policy Name: Conflict Minerals Policy

Responsible Corporate Function/Business Segment: Global Supply Chain (GSC)

Coverage: All Greif Colleagues

Policy Overview & Objective

This policy outlines Greif's commitment to ethical sourcing regarding conflict minerals, and compliance with the Dodd-Frank Wall Street Reform and Consumer Protection Act and the EU Conflict Minerals Regulation.

Conflict Minerals Overview:

In recent years, risks have emerged regarding tin, tantalum, tungsten, gold, or their ores and mineral derivatives ("conflict minerals") that originate from conflict-afflicted and high-risk countries ("CAHRA") like the Democratic Republic of Congo (DRC) and its adjoining countries. These CAHRA regions are identified by the presence of armed conflict or violence that can be linked to human rights abuses and violations of national or international law. There is risk that entities in these CAHRA regions are using the proceeds of mining operations to fund these conflicts.

Greif's Commitment:

Greif is directed by the core principles of our business, called the Greif Way, and is committed to ethical business practices and compliance with all applicable laws and regulations. We are therefore dedicated to working with our customers and suppliers to responsibly source the materials we use in manufacturing our products. As required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the EU Conflict Minerals Regulations, Greif conducts annual due diligence and reports on the use of conflict minerals in their products.

Greif's due diligence follows the international responsible sourcing standards set by the Organization for Economic Co-Operation and Development ("OECD").

Step One – Establish Strong Management Systems: In addition to this policy, Greif has a cross-functional team that oversees the supply chain due diligence process and reviews any intentional added use of conflict minerals in Greif products.

Step Two – Identify Risks: Greif conducts traceability exercises for any sourced conflict minerals utilizing the Responsible Minerals Institute ("RMI") resources, including but not limited to the Conflict Minerals Reporting Template ("CMRT").

Step Three – Manage Risks: If any risks are identified in the traceability exercises, senior management is notified for evaluation and development of potential mitigation plans.

Step Four – Audit the Control Point: Greif’s goal is to confirm that all conflict minerals sourced can be traced back to a smelter that has been audited and is conformant per RMI’s standards. All suppliers are encouraged to utilize RMI-conformant smelters.

Step Five – Communicate and Report: Following the traceability exercises, Greif annually reports its conflict mineral due diligence process and publishes its findings to its website and to the SEC.