
Equal Employment Opportunity & Diversity in the Workplace Policy

Effective: September 1, 2009

Coverage: Worldwide

The Company acknowledges that each country may have specific rules and laws that govern the hiring, promotion, transfer, etc. of employees. It is the intent of this Policy to recognize those differences and to ensure that the applicable laws addressing equal opportunity and diversity are followed per the requirements of each country.

Overview

Greif, (Company), values equal employment opportunity and diversity. These two standards reflect our belief that the ability to do the job is the key element in employment decisions and practices. The Company will continue to make all employment related decisions without regard to gender, sexual orientation, race, color, religion, ancestry, national origin, disability, age, veteran/military status, marital status or any other non-job related factor. Greif will treat all employees fairly and will provide opportunities to progress within the organization.

Greif acknowledges and understands the significance of diversity. Diversity is the existence of many unique individuals in the workplace, marketplace and community. This includes men and women from different nations, cultures, ethnic groups, generations, backgrounds, skills, abilities and all the other unique differences that make each of us who we are.

Diversity is one of the principles that guide our business. The Greif Way states, "Strong through Diversity. We encourage and embrace our diversity of culture, language, location and thought. Our differences define but do not divide us; our common interests unite us. From the many, we are one: Greif."

We believe that one of our great strengths is the rich diversity of our employees and recognize that organizational performance is greatly enhanced when people with different backgrounds and perspectives are engaged in the Company's activities and decision-making process.

We believe diversity is an asset essential to accomplishing our work and view diversity as recognizing the differences in each employee and to provide mutual respect and understanding among employees so that each employee has the opportunity to fully participate in creating business success and where each person is valued for his or her distinctive skills, experiences and perspectives. The Greif Way also states, "Respect Others. We treat people the way we would like to be treated while being respectful of their cultural norms."

Purpose

Greif reaffirms its commitment and will provide equal employment opportunity without regard to gender, sexual orientation, race, color, religion, ancestry, national origin, disability, age, veteran/military status, marital status, or any other characteristic protected by applicable law.

The Company will not tolerate employee or business partner behaviors that violate the spirit and intent of that commitment.

This policy will apply to all employment practices, including but not limited to recruitment, hiring, training and development, promotion, job assignments, transfer, discipline, termination, layoff, compensation, benefits, social and recreational programs, use of facilities and all other conditions and privileges or employment in accordance with applicable country, federal, state and local laws.

We will base employee-related decisions on non-discriminatory factors, emphasizing skills, abilities, performance, and other job-related factors.

Reporting Discrimination

All employees have the right to work in a workplace that is free of discrimination. If you believe that another employee or business partner of the company has violated this policy, you should report the incident to your immediate supervisor. If you have a problem discussing this issue with your supervisor, contact another member of management at your location.

At any time, you can also contact the Human Resources manager for your location or call Corporate Human Resources at 740-549-6000 for assistance.

Often, obtaining a better understanding of how a decision was made helps in resolving the issue.

Accordingly:

- All complaints will be thoroughly investigated and any employee violating this policy may be subject to disciplinary action up to and including termination. Any business partner found to have violated this policy may be subject to termination of business dealings.
- The company will not retaliate against an individual who makes a good faith report of alleged discrimination and will not permit employees or business partners to do so. Such retaliation should be reported immediately.
- Employees or business partners who retaliate will be subject to disciplinary action, up to and including termination of employment or business dealings.
- Employees who bring false claims or misleading allegations in reporting alleged discrimination or during the investigation will be subject to disciplinary action.

General Administration

Each management member is responsible for ensuring that this policy is communicated to his/her employees and administered consistently and fairly.

All employees play an important role in maintaining an environment of equal opportunity, and must treat all colleagues with respect and professionalism. Every employee is accountable for the achievement of this policy objective.

Policy Change

This Policy sets forth the preferred approach to equal employment opportunity and diversity in the workplace. It is not intended to form a contract with employees, or to change the at-will employment status of any employee. The Company reserves the right to alter, amend, or terminate this Policy at any time and at its sole discretion.

Questions

General questions regarding this Policy should be directed to your supervisor, manager or Regional Human Resources manager.