



PACKAGING SUCCESS TOGETHER™

Control No: HR 105

Policy Name: Relationships at Work Policy

Responsible Corporate Function/Business Segment: Human Resources

Effective: 1 October 2017

Coverage: Global--All employees, which term includes for purposes of this policy temporary employees and contract and subcontract workers

Policy Overview & Objective

Greif's goal is to avoid creating or perpetuating circumstances in which the possibility of favoritism, conflicts of interest or impairment of efficient operations may occur. Greif allows for the employment of relatives of current employees, as long as such employment does not create actual or potential conflicts of interest. Greif strongly discourages romantic or sexual relationships between a manager or other supervisory employee and employees who report directly or indirectly to that person because such relationships may create actual or potential conflicts of interest.

The purpose of this policy is to establish consistent practices regarding employment of relatives within Greif and to provide guidance in areas where personal relationships overlap with working relationships.

The Policy

Greif may hire a relative of a person currently employed by Greif only if such candidate for employment: a) is qualified for the position, b) will not be working directly or indirectly for or directly or indirectly supervising a Close Relative (as defined in this policy), and c) will not occupy a position in he or she can initiate or participate in decisions involving a direct benefit to a Close Relative or in which a Close Relative can initiate or participate in such decisions regarding him/her. Such decisions include, but are not limited to, hiring, retention, transfer, promotion, wages and leave requests. This policy applies to all current employees and candidates for employment.

“Close Relative” is defined as one of the following: relationships –parent, child, grandparent, grandchild, brother, sister, uncle, aunt, nephew, niece and first cousin; and relationships by marriage– spouse/partner (as defined by applicable local law), step-parent, step-child, brother-in-law, sister-in-law, father-in-law, mother-in-law, son-in-law, daughter-in-law, step or half-brother, step or half-sister, uncle, aunt, nephew, niece, first cousin, spouse/partner of any of the above, and a person with whom the employee is involved in a romantic or sexual relationship.

Promotions/Transfers

Individuals will not be promoted or transferred into a position that would result in a violation of this policy or that would otherwise create an actual or perceived conflict of interest. If there is a situation where an action of Greif, such as a reduction in force, results in involuntary circumstances which would conflict with the requirements of this policy, one of the employees will be reassigned or transferred, whenever possible. The determination of which employee will be transferred will be based on the needs of the business. If a reassignment or transfer is not practical or possible, termination of one or both of the employees may occur.

Consensual Romantic or Sexual Relationships

Greif strongly discourages romantic or sexual relationships between a manager or other supervisory employee and any employee reporting directly or indirectly to that person because such relationships may create actual or potential conflicts of interest or the appearance of such conflicts. In addition, such a relationship may give rise to the perception by others that there is favoritism or bias in employment decisions affecting an employee involved in such a relationship. Moreover, given the uneven balance of power within such relationships, consent by the subordinate employee is suspect and may be viewed by others or, later, by the subordinate employee, as having been given as the result of coercion or intimidation.

Relationship Disclosure

If any employee of Greif enters into a consensual relationship that is romantic or sexual in nature with another employee that would result in a violation of this policy, the parties must promptly notify their manager and HR Representative.]. Timely reporting of such relationships will not result in disciplinary action. However, failure to timely report such relationships in a timely fashion will result in discipline. If you are uncertain whether a relationship must be reported under this policy, you should contact the local HR representative.

Once the relationship is made known to Greif, the company will review the situation and a determination will be made regarding whether one or both parties should be reassigned to another job or department. If it is determined that one party must be transferred, and there are positions in other departments available for both, the Company may, in its discretion, permit the parties to decide who will be the one to apply for a new position. If, in this situation, the parties cannot amicably come to a decision, or the party is not

chosen for the position to which he or she applied, the Company will decide which party should be reassigned. The decision will be based on the needs of the business. If no other positions are available for either party, the parties will be given the option of terminating their relationship or deciding between themselves which one will resign. If the parties are unwilling or unable to do so, the Company will decide based on business needs which employee will be terminated.

A Close Relative relationship may be created between current employees in ways other than the initiation of a sexual or romantic relationship between them. For example, if an employee married his or her supervisor's non-employee child, that would create an in-law relationship between the employee and supervisor, which is a Close Relative relationship under this policy. In any circumstance in which a Close Relative relationship is created between current employees, the parties involved are subject to the same requirements as described in this policy for romantic or sexual relationships with respect to reporting of relationships, reassignment and/or separation from employment.

The Procedure

n/a

References

n/a

Addendum

Adopting Organizations

The Relationships at Work Policy has been adopted by all locations worldwide as of with the exception of:

- Container Life Cycle Management LLC (a Greif, Inc. Joint Venture)
- Boxboard Products, Inc.