

Control No: HR 104

Policy Name: Human Rights 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

Respect for human rights is fundamental to the sustainability of Greif and the communities and countries in which we operate. Our policy is built upon our commitment to ensure others are treated with dignity and respect. Greif's **Human Rights policy (HR 104- Global)**, guided by the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact, is globally applicable.

The purpose of this **Human Rights policy (HR 104 – Global)** is to ensure that Greif's respect of human rights is understood and applicable to our customers, employees, suppliers and other stakeholders.

The Policy

Support and respect of internationally proclaimed human rights

Greif recognizes that respect for human rights is fundamental to the sustainability of Greif and the communities and countries in which we operate. Greif's **Human Rights policy (HR 104-Global)** will be reviewed every other year and updated accordingly.

Commitment to a Human Rights Grievance process

Greif is committed to identify, prevent and mitigate adverse human rights impacts resulting from or caused by our business activities. Our stakeholders, including our customers, employees and suppliers are encouraged to bring suspected adverse human rights concerns to Greif Legal Counsel, Human Resources and/or the Greif Alert Line.

Community and Stakeholder Engagement

Greif recognizes all of its various impacts on the communities in which it operates. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

Freedom of association and right to collective bargaining

Greif respects our employees' rights to join, form, or not to join a labor union without reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, Greif is committed to establishing a constructive relationship with such union and committed to bargaining in good faith.

Elimination of forced and compulsory labor

Greif prohibits the use of all forms of forced labor and compulsory labor, including prison labor, indentured labor, bonded labor, military labor, slave labor, and any form of human trafficking.

Abolition of child labor

Greif prohibits the hiring of individuals that are under the age of 16 of age; furthermore, Greif prohibits the hiring of individuals under the age of 18 for positions in which hazardous work is required.

Diversity, Anti-harassment and Anti-discrimination

Greif values the diversity of the people with whom we work and the contributions they make. We encourage and embrace our diversity of culture, language, location and thought. We have a long-standing commitment to equal opportunity and intolerance of harassment and discrimination in the workforce. Greif is dedicated to maintain workplaces, which are free from harassment or discrimination based on race, sex, color, national or social origin, religion, age, disability, sexual orientation, gender identity, or any other status protected by applicable law. Greif maintains an **Anti-Harassment and Anti-Discrimination Policy (HR 100 – Global)** related to any forms of harassment or discrimination that applies to employees, customers and vendors/suppliers work hours, wage and benefits.

Work hours, wages and benefits

Greif compensates employees competitively relative to the industry and local labor markets. Greif commits to operate in full compliance with applicable wage, work hours, overtime and benefit laws.

Safe and healthy workplace

Greif is committed to providing a safe and healthy workplace and complying with applicable safety and health laws, regulations and internal requirements. Greif is also committed to maintaining a safe work environment and engaging our employees to continually improve health and safety in our workplaces.

Workplace security

Greif is committed to maintaining a workplace that is free from violence, harassment, intimidation, retaliation, or other unsafe or disruptive conditions and protecting the privacy and dignity of our employees.

Working against corruption, including extortion and bribery.

Greif adheres to the “Greif Way” which provides guidance as to the expected manner in which Greif colleagues conduct themselves, as well as, interact with customers and vendors/suppliers. The Greif Way prohibits extortion and bribery and annual training is conducted and required by Greif colleagues on the topic of extortion and bribery, among various other ethical considerations.

Guidance and Reporting for Employees

Greif creates workplaces in which open and honest communications among all employees are valued and respected. Greif is committed to following all applicable labor and employment laws wherever we operate. If you believe that a conflict arises between the language of the policy and the laws, customs and practices of the place where you work, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns through existing processes (including the **Greif Alert Line**). Every effort will be made to maintain confidentiality. You may ask questions or report potential violations to local Management, Human Resources, or the Legal Department. Employees can also report suspected violations through the Alert Line. Information about how to access the Alert Line is displayed in every Greif facility and the posting of the policy is monitored annually. No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. Greif is committed to investigating, addressing and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.

The Procedure

n/a

References

Please see the related **Anti-Harassment and Anti-Discrimination Policy (HR 100 – Global)**.

The **Greif Alert Line** is a free telephone service available to employees around the world 24 hours a day, 7 days a week. This toll-free telephone line will be answered by an outside service company, which will take your report and work with Greif personnel to address and resolve the issue. You do not have to give your name to the Greif Alert Line specialist unless you decide to do so.

The **Greif Alert Line** number is +1 (877) 781-9797. If you call from outside of North America, you can call this number free of charge by using the AT&T Direct access code for your country. Country access codes are found at <http://www.business.att.com/bt/access.jsp>.

Please see The Greif Way for additional information.

Addendum

n/a