PACKAGING CORPORATION OF AMERICA

TNFD INDEX

2024 RESPONSIBILITY REPORT

Task Force on Nature-Related Financial Disclosures (TNFD) Index

Table of Contents

Governance

Describe the board's oversight of nature-related dependencies, impacts, risks and opportunities.

PCA's Board of Directors oversee the critical risks and financial impacts related to nature and the direction we take as a company at the highest level. The Board receives regular updates from the Chair of our Sustainability Committee on nature-related trends, issues, risks and opportunities that have a direct and indirect impact on the company's overall business operation. In addition to our Board, we have a Carbon Neutrality Team who are responsible for the operational and strategic aspects of our climate change-related activities.

- Sustainability Committee: comprised of four Board members including our Chief Executive Officer, our Sustainability Committee oversees the company's practices, performance and strategy regarding environmental, health and safety, sustainability and corporate responsibility. PCA's Senior Vice President, Tax, ESG and Government Affairs and our Senior Vice President, Engineering and Operations Support attend every meeting of this Committee and provide updates on various sustainability matters including regulatory developments and impacts, water, forestry, climate related risks and opportunities, and progress updates on our evaluation of carbon capture technology including permanent carbon dioxide storage solutions. The Committee Chair regularly updates our full Board on these matters.

See 2024 Responsibility Report, page 9

Describe management's role in assessing and managing nature-related dependencies, impacts, risks, and opportunities.

Various groups and individuals across our operations take part in helping PCA execute our climate and nature strategy, including identifying and analyzing efficiency improvements and opportunities, and the evaluation and implementation of climate and nature-related business activities. PCA's Senior Vice President, Tax, ESG and Government Affairs provides oversight for the ESG and Corporate Sustainability team, which coordinates PCA's ESG and corporate sustainability strategy and activities, including ESG reporting and climate change and nature matters. This group helps integrate PCA's nature strategy in collaboration with other functional teams, leads our ESG reporting efforts, and evaluates and reports on different ESG and sustainability topics and the impacts on our business. The ESG and

Corporate Sustainability team provides guidance to the company's leadership on key sustainability and ESG trends.

PCA's Research and Innovation Center, led by the Vice President of Product Strategy and Quality, drives our product performance strategy. They develop innovative paper-based packaging products with a goal to improve sustainability. The Center supports our design and sales teams in collaborating with customers to create fiber-optimized, performance-based packaging solutions. They also develop proprietary tools and resources that support PCA's designers in engineering right-sized packaging solutions that conserve raw material inputs and energy.

See 2024 Responsibility Report, page 9

Describe the organisation's human rights policies and engagement activities, and oversight by the board and management, with respect to Indigenous Peoples, Local Communities, affected and other stakeholders, in the oganisation's assessment of, and response to, nature-related dependencies, impacts, risks and opportunities.

PCA Code of Ethics and Business Conduct references our support of freedom of association, principles of international efforts such as the UN Guiding Principles on Business and Human Rights and the eight fundamental conventions of the International Labour Organization.

PCA is committed to upholding the principles of sustainable forestry and is certified to the three primary standards in North America: the Sustainable Forestry Initiative® (SFI) Standard Requirements, the Forest Stewardship Council® (FSC®) and the Programme for the Endorsement of Forest Certification (PEFC). Each year, PCA undergoes third-party audits that assess our operations and the forests that PCA sources wood from. The assessment includes compliance with the law, workers' rights and employment conditions, Indigenous Peoples' rights, biodiversity and environmental impacts, and application of forestry best management practices (BMPs). PCA works with organizations with expertise in traditional rights to implement control measures to protecting rights of Indigenous Peoples in our mill wood sourcing basins in Canada. Additionally, all wood fiber suppliers agree to deliver wood fiber that qualify as controlled material as defined by FSC, which includes sources that are not from forest areas where traditional or civil rights are violated.

See Code of Ethics and Business Conduct, Addendum to Terms and Conditions for the Purchase of Wood Fiber Goods, and 2024 Responsibility Report, pages 46.

Strategy

Describe the nature-related dependencies, impacts, risks and opportunities the organization has identified over the short, medium and long term.

We begin with the identification and assessment of ESG risks broadly with our annual materiality assessment, which informs our ESG & Sustainability team of where to prioritize their research for the year. This research is combined with the knowledge of our operations, stakeholder priorities, and the political landscape, to contextualize risks. PCA's Sustainability Committee and Board have oversight of nature related risks and evaluate most risks qualitatively.

PCA uses a due diligence system in conformance with the Sustainable Forestry Initiative®(SFI) and Programme for the Endorsement of Forest Certification (PEFC) standards to avoid controversial sources in our supply chain. Each year we evaluate the contiguous United States and Canada against risk criteria outlined in both standards. Wood fiber is risk-assessed based on its geographical origin, as well as risk of mixing with unacceptable sources of wood in the supply chain.

In 2019, FSC released its first Controlled Wood National Risk Assessments for the U.S. and Canada.38 The assessments define specified risks for High Conservation Values (HCV) and Conversion in the U.S. and Canada and Traditional Rights in Canada. Several of these risks occur within PCA mill wood sourcing basins. To mitigate these risks, PCA works with several organizations with expertise in these fields to implement control measures throughout its wood fiber supply chain. This work is critical to ensure the health and viability of these forested areas, as well as to protect the rights of Indigenous groups in Canada.

We employed climate-change scenario analysis to examine how future climate-related risks and opportunities could impact your business. This strategic approach allows for both short- and long-term planning based on varying levels of emissions, policy changes, and technological advancements, ensuring that we account for a wide spectrum of possible outcomes. Our Carbon Neutrality Team is a cross-functional team from leaders across various departments. Our understanding of the risks is integrated into our carbon reduction initiatives. For instance, we've prioritized explorations on carbon capture and storage, because we are uniquely positioned to sequester large volumes of biogenic carbon dioxide without putting additional strain on forests.

All PCA mills are in water-rich areas, and water withdrawn by PCA mills does not have a measurable adverse impact on the local economy, people or the environment. Most of the water we use is treated and released back to the local watershed. Protocols and tests are

in place to ensure that the water that we release is non-toxic, clean and safe for our communities. PCA views water stewardship as the use and management of water that is environmentally sustainable, economically sound and socially beneficial. Water stewardship efforts are a joint effort between our Corporate Environmental team and local environmental experts at each of our mills. Expert judgement and industry-related experience across our environmental experts are used to identify water-related impacts. Historical data is used to benchmark against current data to inform and discover the existence and severity of water-related impacts, alongside global water trends and local geographical developments. These assessments are done on an annual basis, using qualitative analysis and patterns revealed through the review of comparative quantitative data. Corporate and local environmental staff are in regular communication, and once per year environmental managers from each of our eight mills and corporate environmental leaders convene for an "environmental roundtable" to highlight risks and opportunities pertaining to air emissions, effluents and waste.

See 2024 Responsibility Report, pages 25, 34, 46, 2024 Annual Report, pages 12-13, 26-28, 2024 10-K, pages 13-14

Describe the effect of nature related dependencies, impacts, risks and opportunities have had on business model, value chain, strategy, and financial planning, as well as any transition plans or analysis that may be in place.

PCA has a demonstrated track record of environmental compliance excellence and a strong commitment to environmental stewardship. We have implemented a comprehensive environmental management system to ensure full compliance with all applicable laws and regulations at the federal, state and local levels. Our commitments and investments in environmental excellence provide assurance of our responsible operation and compliance to investors, employees, customers, vendors and the public. Through our business operations and leveraging the power of trees within our existing value chain, we aim to contribute and help transition to a low-carbon world.

We are continuously working to reduce our scopes 1 and 2 emissions by proven methods, including enhancing circular economy principles we currently employ in our production processes to recover and reuse chemicals, water and fiber. PCA announced our climate goal in 2022 to become a net-zero emissions company by 2050, with 2030, 2040 and2050 climate targets from a 2021 baseline (using a market-based inventory). Based upon our current assumptions, these targets include using trees and post-combustion carbon capture technology to remove 1.75 million metric

tons of CO2 from the atmosphere per year by the year2040 and an additional 2.35 million metric tons per year by the year 2050, for a total of 4.1million metric tons. Achieving our 2050 carbon removal target with carbon capture technology would provide a 68% reduction across scopes 1, 2 and 3 emissions from our 2021 baseline using a market-based inventory, and 75% using a location-based inventory.

PCA strives to contribute to maintaining a healthy, sustainable ecosystem of forestry by sourcing our timber from sustainable sources and connecting growers of timber to end markets, providing them with appropriate economic incentives to continue to grow trees that provide important ecosystem services during their lifecycle. PCA is committed to practicing and supporting sustainable forestry and responsible wood fiber procurement.

See 2024 Responsibility Report, Inside Cover, pages 23,25,34,46, 2024 Annual Report, pages 12-13, 26-28, 2024 10-K, pages 13-14.

Describe the resilience of the organisation's strategy to nature-related risks and opportunities, taking into consideration different scenarios.

See 2024 TCFD Index

Disclose the locations of assets and/or activities in direct operations and, where possible, upstream and downstream value chain(s) that meet the criteria for priority locations.

First-use fiber is sourced almost exclusively from the United States, with less than 1% sourced from Canada (Ontario and Manitoba) by our International Falls white paper mill. PCA procures wood from private and public timberlands in the form of roundwood and in-field chips. We also procure residuals from sawmills in the form of chips and sawdust.

In 2019, FSC released its first Controlled Wood National Risk Assessments for the U.S. and Canada. The assessments define specified risks for High Conservation Values (HCV) and Conversion in the U.S. and Canada and Traditional Rights in Canada. These risks occur within PCA mill wood sourcing basins: HCV in the Southeastern U.S., Pacific Northwest U.S. and Ontario and Manitoba, Canada; Conversion in the Southeastern U.S. and Pacif Northwest U.S. and Traditional Rights in Canada. To mitigate these risks, PCA works with several organizations with expertise in these fields to implement control measures

throughout its wood fiber supply chain. This work is critical to ensure the health and viability of these forested areas.

Overall water risk is measured by aggregating selected indicators for the given area in water quantity, quality, and regulatory and reputational risk categories. A higher water risk value indicates higher overall water risk. Baseline water stress measures the ratio of total water demand (consumptive plus non-consumptive withdrawal) to available renewable surface and groundwater supplies in the area. A higher water stress value indicates more competition among users of water sources in the area and does not signal any relationship between the demand and supply of water in the given area. While our Tomahawk mill water risk assessment indicated high baseline water stress, it is not indicative of ambient conditions nor our actual experience. Baseline water depletion measures the ratio of total water consumption (consumptive withdrawal) to available renewable water supplies. A higher water depletion value indicates larger impact on the local water supply and decreased water availability for downstream users.

See 2024 Responsibility Report, pages, 34, 46

Risk Management

Describe the process for identifying, assessing and prioritizing nature-related dependencies, impacts, and opportunities.

PCA's Carbon Neutrality Team is made up of a cross-functional group of key engineering, environmental, government affairs, legal, operational, procurement, tax and sustainability employees to provide strategic direction for, and oversees our carbon reduction efforts. This team meets nearly every week to discuss progress on strategic initiatives, opportunities, and risks that are related to the company's climate strategy and is co-sponsored by PCA's Senior Vice President, Tax, ESG and Government Affairs and Senior Vice President, Engineering and Operations Support. The Carbon Neutrality Team will consider nature-related dependencies, impacts and opportunities in 2025.

Describe the processes for identifying, assessing and prioritizing nature-related dependencies, impacts, risks and opportunities in its upstream and downstream value chain(s).

OMISSION: While PCA has undertaken a formal process for climate, water and forestry dependencies, a process specific to nature has not been completed.

Describe the processes for monitoring nature-related dependencies, impacts, risks and opportunities.

OMISSION: While PCA has undertaken a formal process for climate, water and forestry dependencies, a process specific to nature has not been completed.

Describe how processes for identifying, assessing, prioritizing and monitoring nature-related risks are integrated into and inform overall risk management processes.

OMISSION: While PCA has undertaken a formal process for climate, water and forestry dependencies, a process specific to nature has not been completed.

Metrics and Targets

Disclose the metrics used to assess and manage material nature-related risks and opportunities in line with the strategy and risk management process.

PCA discloses five years of data on a wide variety of nature-related metrics including sustainable forestry, raw material use, volume of wood fiber, water use, waste, climate change and environmental compliance.

See 2024 Responsibility Report, pages 78-81

Disclose the metrics used to assess and manage dependencies and impacts on nature.

PCA relies on internal and external data to assess and manage nature-related dependencies and impacts. Many of our internal metrics are disclosed in our annual Responsibility Report. Examples of externa data resources include the World Resources Institute (WR) Aqueduct 4.0 Water Risk Atlas, American Forest & Paper Association (AF&PA), United States Department of Agriculture (USDA) Forest Resources of the United States, National Council of Air and Stream Improvement (NCASI), Greenhouse Gas Protocol Land Sector Removal Guidance, FSC US and Canada Controlled Wood Risk Assessments, among others.

See 2024 Responsibility Report, pages 25, 34, 46, pages 78-81

Describe the targets and goals used to manage nature-related dependencies, impacts, risks and opportunities and performance against these.

While PCA has not set targets and goals for all nature-related dependencies, we have nine Sustainable Business Principles to align our strategies, set goals for the organization and report our progress through 2050. These Principles address maximizing efficiency, upholding principles of sustainable forest management, increasing the use of renewable and carbon-free energy sources, and being good stewards of the watersheds and aquifers we depend on for our operations.

In 2022, PCA published our climate goal to become a net-zero emissions company by 2050, with 2030, 2040, and 2050 climate targets from a 2021 baseline (using a market-based inventory). The details of our climate goal are described in our annual Responsibility Report. In compliment to our climate change targets, we work with our energy technical services and engineering teams to find ways to reduce energy usage and to use types of energy that are clean and sustainable. We place a great emphasis on water reuse and recycling in our mills. Whenever possible, water used in our manufacturing process is reused until the water is no longer suitable for use. Continuous water reduction and water conservation topics and planning are discussed during monthly production and planning reviews. We work to reduce operational waste by identifying beneficial reuses of waste and engaging with our vendors to develop innovative solutions. We also work to educate consumers about corrugated and paper recycling through advocacy programs. Our sustainable forestry program promotes reforestation, conservation of biological diversity, respect for traditional and civil rights and maintaining high rates of compliance with forestry Best Management Practices (BMPs).

See 2024 Responsibility Report