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INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934
or Section 30(h) of the Investment Company Act of 1940

1. Name and Address of Reporting Person * <u>Roche Jean Francois</u> <hr/> (Last) (First) (Middle) <u>1500 RIVEREDGE PARKWAY, N.W.</u> <u>9TH FLOOR</u> <hr/> (Street) <u>ATLANTA GA 30328</u> <hr/> (City) (State) (Zip)	2. Date of Event Requiring Statement (Month/Day/Year) <u>05/20/2026</u>	3. Issuer Name and Ticker or Trading Symbol <u>GRAPHIC PACKAGING HOLDING CO [GPK]</u>	
		4. Relationship of Reporting Person(s) to Issuer (Check all applicable) Director 10% Owner <input checked="" type="checkbox"/> Officer (give title below) Other (specify below) <u>SVP, Chief Commercial Officer</u>	5. If Amendment, Date of Original Filed (Month/Day/Year) 6. Individual or Joint/Group Filing (Check Applicable Line) <input checked="" type="checkbox"/> Form filed by One Reporting Person <input type="checkbox"/> Form filed by More than One Reporting Person

Table I - Non-Derivative Securities Beneficially Owned

1. Title of Security (Instr. 4)	2. Amount of Securities Beneficially Owned (Instr. 4)	3. Ownership Form: Direct (D) or Indirect (I) (Instr. 5)	4. Nature of Indirect Beneficial Ownership (Instr. 5)
<u>Common Stock</u>	<u>53,754</u>	<u>D</u>	

Table II - Derivative Securities Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)

1. Title of Derivative Security (Instr. 4)	2. Date Exercisable and Expiration Date (Month/Day/Year)		3. Title and Amount of Securities Underlying Derivative Security (Instr. 4)	4. Conversion or Exercise Price of Derivative Security	5. Ownership Form: Direct (D) or Indirect (I) (Instr. 5)	6. Nature of Indirect Beneficial Ownership (Instr. 5)
	Date Exercisable	Expiration Date				
<u>Service-Based Restricted Stock Units⁽¹⁾</u>	<u>(2)</u>	<u>(3)</u>	<u>Common Stock</u>	<u>10,915</u>	<u>0.00</u>	<u>D</u>
<u>Service-Based Restricted Stock Units</u>	<u>(4)</u>	<u>(3)</u>	<u>Common Stock</u>	<u>66,007</u>	<u>0.00</u>	<u>D</u>
<u>Service-Based Restricted Stock Units⁽¹⁾</u>	<u>(2)</u>	<u>(3)</u>	<u>Common Stock</u>	<u>5,723</u>	<u>0.00</u>	<u>D</u>
<u>Service-Based Restricted Stock Units⁽¹⁾</u>	<u>(2)</u>	<u>(3)</u>	<u>Common Stock</u>	<u>1,551</u>	<u>0.00</u>	<u>D</u>

Explanation of Responses:

- The grant of Service-Based Restricted Stock Units is 1/3 of a total grant that includes Performance-Based Restricted Stock Units, which are reportable upon settlement.
- The Service-Based Restricted Stock Units vest and become payable in three substantially equal tranches on the first, second and third anniversaries of the date of grant, except in the event of death, disability, retirement, involuntary termination or termination for good reason within one year following a change in control.
- The Service-Based Restricted Stock Units expire upon their conversion and payment in shares of the Company's Common Stock as described under "Date Exercisable."
- The Service-Based Restricted Stock Units vest and become payable in substantially equal tranches on the first and second anniversaries of the date of grant, except in the event of death, disability, retirement, involuntary termination or termination for good reason within one year after a change in control.

/s/ Jean-Francois Roche, by Laura Lynn Church, Attorney-in-Fact 05/21/2026

** Signature of Reporting Person Date

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

* If the form is filed by more than one reporting person, see Instruction 5 (b)(v).

** Intentional misstatements or omissions of facts constitute Federal Criminal Violations See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB Number.