



Smurfit  
Westrock

# Supplier Code of Conduct

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## Introduction

Smurfit Westrock ('SW' or 'the Company'), is the go-to sustainable packaging partner of choice. We offer an unrivalled product portfolio and bring expertise, scale and a global presence of 500+ operational locations across 40 countries. With the circular economy at the core of our business, we use renewable, recyclable and recycled materials to create sustainable packaging solutions.

SW is dedicated to conducting business in accordance with the highest ethical standards. Our Supplier Code of Conduct ('Code') reflects our dedication to operating sustainably and responsibly complying with all applicable laws and regulations with integrity, purpose, and good business ethics.

SW expects its suppliers to share this same commitment and, as a condition of doing business, requires its suppliers to follow the expectations of conduct in the Code. Suppliers must take reasonable measures to ensure that any suppliers from which they source act in accordance with the Code. The Code and related policies supplement contract requirements.

## Applicability

The Code applies to all our suppliers worldwide. SW requires its suppliers and their employees, contractors subcontractors or anyone acting on behalf of these parties in providing goods or services to SW (collectively 'Representatives') to comply with the Code. Smurfit Westrock expects all its suppliers to have adequate policies and procedures as applicable, and to ensure that the Code as well as all applicable laws and regulations in the regions where they operate are adhered to while they conduct business with their Representatives. For wood and fiber sourcing, suppliers are expected to comply with the requirements defined in the SW Sustainable Forestry and Fiber Sourcing Policy.

## Compliance with laws and regulations

Suppliers must operate their businesses in compliance with, laws and regulations in the jurisdictions of the countries, provinces, states, regions and municipalities applicable to their businesses and operations, as well as in alignment with applicable principles of the Universal Declaration of Human Rights, the United Nations Guiding Principles of Business and Human Rights, the International Labour Organisation's Principles and Rights at Work, the Global Compact of the United Nations and the Ethical Trade Initiative. We set a minimum standard of compliance with the laws and regulations and expect suppliers to adopt practices that demonstrate continuous improvement and leadership in ethical and sustainable business conduct.

## Ethical business practices

Suppliers must abide by all applicable anti-corruption, anti-bribery, anti-trust, sanctions, and fraud laws and regulations. Suppliers shall not engage in bribery, kickbacks, collusive bidding, price fixing, extortion, embezzlement or other unfair trade practices and must pursue a zero-tolerance approach towards such conduct. Suppliers may not offer, promise, or give a financial or other advantage which could be interpreted as a bribe to an employee of SW to encourage him/her to provide a commercial advantage or favor. If an SW employee requests a bribe for a supplier, the supplier should report it to the Company.

Any ownership or beneficial interest in a supplier's business by a government official, representative of a political party or a SW employee must be disclosed to SW prior to engaging in any business relationship with SW.

The Company encourages its suppliers to maintain clear internal policies or guidance documents and appropriate procedures to support compliance with laws and regulations.

The Company does not tolerate unlawful discrimination and is committed to the elimination of any illegal labor practices in all areas of its business, including its suppliers.

Health and Safety: Our suppliers will have safety policies, use relevant safety systems, and continually seek out ways to improve processes to ensure good health and safety practices.

Safeguarding the Natural Environment: Our suppliers will commit to protect the human and natural environment through the efficient use of resources. Our suppliers will focus on preventing pollution, will promote recycling and the sustainable use of natural resources, minimize waste and will respect Indigenous peoples and traditional livelihoods.

### **Privacy and Data Protection**

Suppliers must comply with all applicable data protection and privacy laws and regulations concerning the collection, use, processing and protection of data including personal information. Suppliers must take appropriate steps to safeguard confidentiality and privacy of all data and personal information of individuals. Where applicable, suppliers are expected to implement a cyber security policy that protects from unauthorized access, alteration or destruction of data and systems related to SW business operations.

### **Product Stewardship**

Traceability: SW values supply chain transparency. At our request and at no additional charge, suppliers will provide documentation and data necessary for SW to verify the composition of materials, ingredients, and products supplied to Smurfit Westrock, including where necessary a Continuing Product Guarantee. Suppliers will notify SW prior to any compositional change of any products prior supplying to SW. Suppliers are requested to provide such documentation and data that are required for due diligence of the raw materials in question. For wood and fiber sourcing, the suppliers are expected to comply with the data requirements as set in the SW Sustainable Forestry and Fiber Sourcing Policy.

Conflict Minerals/Restricted Substances: Suppliers shall implement such policies and procedures as may be required to ensure that any materials, ingredients or products provided to SW do not contain restricted (limits established by product or material) and/or prohibited ingredients. In particular, suppliers shall not provide any "3TG" metals (tin, tantalum, tungsten or gold) that were sourced, in entirety or in part, from the high-risk countries that have been listed in the EU Conflict Minerals Regulation 2017/821 and US Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and related SEC rules 2012, 34-6771.

Continuous Improvement: Smurfit Westrock expects its suppliers to collaborate to reduce, eliminate or manage substances of concern and to proactively look for opportunities to provide Smurfit Westrock with safer and more sustainable alternatives to existing materials, ingredients and products.

Smurfit Westrock strives to make a positive impact and maintain good relationships in the local communities in which it operates, its suppliers are expected to do the same.

Suppliers are required to disclose relevant sustainability targets and data, upon request, through the platforms designated by SW or as required by applicable SW policies.

SW created this Code to clarify the principles and expectations for suppliers doing business with the Company. These principles are an important part of our supplier selection and evaluation process. The Code is supported by Smurfit Westrock's Code of Conduct, which cover areas such as the environment, health and safety and human rights and is available on our website. Our suppliers shall take note of, and adhere to, both the Code and Smurfit Westrock's Code of Conduct where applicable. Our suppliers shall implement the appropriate monitoring and compliance programs to

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ensure adherence to this Code, Smurfit Westrock's Code of Conduct where applicable, as well as to relevant laws and regulations. We also maintain mechanisms for employees and suppliers to report possible improper or unethical issues: Suppliers and other third parties may report concerns on our Speak Up service ([speakup.smurfitwestrock.com](https://speakup.smurfitwestrock.com)); and employees may report concerns through business channels, the legal department or our Speak Up service.

By doing business with SW, the Supplier acknowledges and agrees to the principles laid out in the Code as set forth in it. SW, through its regional procurement teams, may assess and/or audit suppliers periodically to monitor and support compliance with this Code, using a risk-based approach.

SW will periodically review and update the Code as necessary

[For more information:](#)

### **Smurfit Westrock Sustainability Department**

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