



**2017-2018** Global Reporting Initiative (GRI) Report

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Unless specified otherwise, all years refer to WestRock's fiscal year, which ends on September 30th.

## 102-14 Introductory Statement

### Dear Fellow Stakeholders:

People, Planet and Performance: these three areas are the focus of WestRock's enterprise-wide sustainability goals. When we established these goals in 2015, we committed to being transparent in reporting our progress as we move forward. This report, which covers fiscal years 2017 and 2018, highlights the work we have accomplished since the publication of our inaugural sustainability report and marks our progress toward reaching our 2025 sustainability goals. This report has been prepared in accordance with Global Reporting Initiative (GRI) standards, Core option. GRI is an internationally accepted framework for businesses to report their impact on critical sustainability issues.

During the period covered in this report, we made significant advancements toward achieving the goals supporting each pillar of our sustainability platform.

- **People**

We are intensely focused on protecting the safety of all of our coworkers and improving safety performance is the cornerstone of our commitment to People. In 2016, we initiated an effort to focus on the prevention of life-changing events, resulting in 20 percent fewer life-changing events in 2018 than 2017.

- **Planet**

Our most energy-intensive operations generate the majority of their steam and electricity needs with carbon-neutral, renewable biomass and use fossil fuels as supplemental energy sources. Since 2015, these facilities have decreased greenhouse gas emissions from fossil fuels by six percent (measured as CO<sub>2</sub>e per ton of production) through reducing coal and oil use and increasing biomass use.

- **Performance**

Our fiber-based packaging solutions are helping customers meet their most significant environmental and sustainability challenges. For example, we manufacture products that can replace plastics and are developing new, innovative packaging products designed for composting and recycling.

We are pleased with our progress but know there is still work to be done, and we have our sights set on the future. We believe we are well-suited for the growing circular economy. WestRock's 100 percent recycled mills are now accepting mixed paper bales that contain paper foodservice packaging, such as single-use cups, takeout cartons and pizza boxes — materials that have historically ended up in landfills. This project illustrates our commitment to the circular economy and was recognized with a Leadership in Sustainability Award from the American Forest & Paper Association.

WestRock continues to grow and change, but sustainability is in our roots. We have never been better positioned to help our customers meet their sustainability challenges and improve the footprint of our own operations. We invite you to learn more about sustainability at WestRock and our journey to reach our 2025 sustainability goals by visiting [www.westrock.com/sustainability](http://www.westrock.com/sustainability).

Sincerely,



Nina E. Butler  
Chief Sustainability Officer  
WestRock Company

## Strategy

# Driving value through sustainability

At WestRock, our vision is to be the premier partner and unrivaled provider of winning solutions to our customers.

## Sustainability is a key part of our business strategy.

We achieve our vision and create value for our customers by:



### Our everyday commitment

Our sustainability goals reflect our commitment to become a safer, more diverse and inclusive workforce, while minimizing our environmental impact and achieving exceptional results for our customers, investors, communities and other stakeholders.

Our global goals support our sustainability platform:



- Safety
- Employee Engagement
- Diversity
- Communities
- Ethics
- Responsible Fiber Sourcing
- Energy Efficiency
- Carbon
- Water
- Innovation
- Supply Chain
- Customers
- Business Performance

**Sustainability isn't just a word. It's in our roots.**

## Sustainability Goals Scorecard

### 2017-2018 Sustainability Goals

[westrock.com/sustainability](http://westrock.com/sustainability)

 <p><b>SAFETY</b>  <b>Goal:</b> Reduce our OSHA recordable incident rate by 25 percent  <b>Progress:</b> 1.4 percent reduction from 2015 baseline. Additionally, we reduced serious injuries, which we call life changing events, by 19 percent from FY17 to FY18.</p>	 <p><b>CERTIFIED FIBER</b>  <b>Goal:</b> Increase purchases of certified virgin fiber by 25 percent  <b>Progress:</b> 3.6 percent increase in certified fiber purchases since 2015</p>	 <p><b>FINANCIAL HEALTH</b>  <b>Goal:</b> Maintain an investment grade credit rating  <b>Progress:</b> Maintained investment grade credit rating since the formation of WestRock in 2015</p>
 <p><b>DIVERSITY &amp; INCLUSION</b>  <b>Goal:</b> Increase participation in our Employee Resource Groups (ERG)  <b>Progress:</b> No change from baseline</p>	 <p><b>CHAIN-OF-CUSTODY</b>  <b>Goal:</b> Certify all our wholly owned fiber-based manufacturing facilities across the globe by 2018  <b>Progress:</b> 85.8 percent of global facilities are chain of custody certified</p>	 <p><b>SUPPLIER CONDUCT</b>  <b>Goal:</b> Ensure suppliers comply with the WestRock Supplier Principles of Conduct  <b>Progress:</b> Developed an online affirmation process for our third party suppliers</p>
 <p><b>COMMUNITIES</b>  <b>Goal:</b> Give back to the communities where we live and work  <b>Progress:</b> Employee relief fund provided 270 grants totaling more than \$560,000 in FY17 and 390 grants totaling more than \$1.1 million in FY18</p>	 <p><b>GREENHOUSE GASES</b>  <b>Goal:</b> Reduce our CO2e emissions by 20 percent per ton of production  <b>Progress:</b> 5.8 percent intensity reduction; nine percent absolute reduction since 2015</p>	 <p><b>CUSTOMERS</b>  <b>Goal:</b> Provide outstanding customer service and measure performance through customer surveys  <b>Progress:</b> Continued increase in Gallup customer engagement score and percentage of fully engaged customers in FY17 and FY18</p>
 <p><b>EMPLOYEE ENGAGEMENT</b>  <b>Goal:</b> Increase and measure employee engagement through periodic surveys  <b>Progress:</b> Surveyed 33,000 employees with an 88 percent employee response rate in FY17. Conducted Pulse survey in FY18 with an 86 percent response rate</p>	 <p><b>ENERGY EFFICIENCY</b>  <b>Goal:</b> Increase energy efficiency of purchased fuels by 10 percent per ton of production  <b>Progress:</b> Four percent decrease in energy efficiency since 2015 due to changes such as replacing coal with natural gas.</p>	 <p><b>INNOVATION</b>  <b>Goal:</b> Apply sustainable design principles to our product development work  <b>Progress:</b> Launched 18 new products with defined sustainability benefits in FY17 and 26 in FY18</p>
 <p><b>ETHICS</b>  <b>Goal:</b> Conduct annual ethics and compliance training  <b>Progress:</b> 10,700 employees completed annual online Code of Conduct training and compliance certification in FY17. 12,600 employees, 98 percent of those required, completed online training and certification in FY18.</p>	 <p><b>WASTE RECYCLING</b>  <b>Goal:</b> Establish waste reduction teams at our largest facilities by the end of 2018  <b>Progress:</b> Waste minimization efforts are ongoing</p>	 <p><b>CERTIFIED OFFICE PRODUCTS</b>  <b>Goal:</b> Increase our purchases of certified office products  <b>Progress:</b> We changed corporate office suppliers and are reevaluating the goal</p>
 <p><b>SUPPLIER DIVERSITY</b>  <b>Goal:</b> Increase spend with minority-owned businesses and suppliers  <b>Progress:</b> Established relationships with 2,500 diverse suppliers resulting in a total spend of \$840 million</p>	 <p><b>WATER USE</b>  <b>Goal:</b> Map the water use in our most water-intensive manufacturing operations by 2018  <b>Progress:</b> Completed water reduction plans for mills in Virginia and Florida that use groundwater in 2018</p>	 <p><b>CERTIFIED LAND</b>  <b>Goal:</b> Increase the amount of land certified to internationally recognized forest management standards  <b>Progress:</b> More than 350,000 acres certified since 2015</p>

## General Disclosures

### Organizational Profile

#### 102-1: Name of Organization

WestRock Company

#### 102-2: Activities, Brands, Products and Services

Visit [www.westrock.com](http://www.westrock.com)

#### 102-3: Location of Headquarters

Our principal executive office is located at 1000 Abernathy Road NE, Atlanta, GA 30328.

#### 102-4: Locations of Operations

Visit [www.westrock.com](http://www.westrock.com)

#### 102-5: Ownership and Legal Form

WestRock Company, a Delaware Corporation, is a publicly traded company listed on the New York Stock Exchange (NYSE: WRK).

#### 102-6: Markets Served

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 page 5 and [www.westrock.com](http://www.westrock.com)

#### 102-7: Scale

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 pages 5, 6, 27, 28, 29.

#### 102-8: Employees

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 page 12.

#### 102-9: Supply Chain

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 pages 6, 7 and [www.westrock.com](http://www.westrock.com)

#### 102-10: Significant Changes

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 page 4.

### 102-11: Precautionary Principle or Approach

WestRock recognizes that it is neither possible nor desirable to eliminate all risk. Rather, we view appropriate risk taking as essential to our long-term success and seek to understand and oversee critical business risks in the context of our business strategy, the magnitude of the particular risk, and the proper allocation of our risk management and mitigation resources. We have a robust internal control environment that facilitates the identification and management of risks. Annually, we interview senior executives and a broad cross-section of WestRock’s functional and operational leaders to identify areas of material risks to the enterprise and seek feedback on the effectiveness of applicable controls. The results of this risk assessment are shared with our Board of Directors and used for internal audit planning purposes. Our Board and its committees receive regular reports from members of senior management on areas of material risk to us, including operational, financial, strategic, competitive, reputational, legal, environmental, health and safety and other regulatory risks, as well as assessments of how these risks are managed.

### 102-12: External Initiatives

WestRock participates in several voluntary programs aimed at advancing social, environmental and economic initiatives.

Organization or Program	Purpose
<b>American Forest &amp; Paper Association (AF&amp;PA), Better Practices, Better Planet 2020</b>	Better Practices, Better Planet 2020 is a voluntary initiative by the member companies of AF&PA to implement a broad set of sustainability goals aimed at preserving and growing the economic contributions of the forest products industry and individual member companies to society; fostering the well-being of communities; promoting sustainable manufacturing practices; advancing energy generation and conservation efforts; and promoting fiber procurement measures that protect the environment.
<b>SFI<sup>®</sup>, FSC<sup>®</sup>, PEFC<sup>™</sup>, CERFLOR<sup>®</sup>, American Tree Farm System<sup>®</sup> (ATFS<sup>®</sup>) forestry certifications</b>	These internationally recognized programs are designed to ensure that virgin fiber used in manufacturing operations is harvested in compliance with laws, with respect for traditional and human rights and in a manner that protects forest ecosystems and regions of high conservation value.
<b>AIM-PROGRESS</b>	AIM-PROGRESS is a forum comprised of companies that intend to promote responsible sourcing practices and sustainable supply chains throughout Europe and North America.
<b>CDP</b>	CDP is a not-for-profit charity that operates a global self-disclosure system for investors, companies, cities, states and regions to measure and manage their greenhouse gas emissions and other environmental impacts.
<b>Supplier Ethical Data Exchange (Sedex) and EcoVadis</b>	Sedex and EcoVadis are membership organizations dedicated to driving improvements in responsible and ethical business practices in global supply chains, focusing on labor issues, health and safety, the environment and business ethics.
<b>The Recycling Partnership</b>	The Recycling Partnership is a national recycling nonprofit formed in 2003. The organization’s goal is to improve recycling in the United States.

**102-13: Membership Associations**

Organization	Description	Governance Level	Project / Committee Level
<b>The Nature Conservancy and The American Forest Foundation</b>	The WestRock Foundation has made a multi-year pledge to the American Forest Foundation and The Nature Conservancy to support projects in the Cumberland Plateau and Eastern Virginia that will encourage forest habitat improvement, forest biodiversity and watershed management.	✓	✓
<b>American Forest &amp; Paper Association (AF&amp;PA)</b>	AF&PA, the national trade association of the forest products industry, advances public policies that promote the U.S. forest products industry.	✓	✓
<b>American Forest Foundation (AFF)</b>	AFF works with families, teachers and elected officials to promote forest stewardship and protect the values provided by the nation's forest heritage.	✓	✓
<b>Brazilian Tree Industry ( )</b>	The Brazilian Tree Industry (Ibá) is an association responsible for representing the planted tree production chain.		✓
<b>Brazilian Pulp and Paper Technical Association (ABTCP)</b>	ABTCP promotes the technological development of the pulp and paper production chain through technical training, information and relationships.		
<b>Brazilian Packaging Association (ABRE)</b>	ABRE supports development of the packaging industry and enhances the quality of packages produced in Brazil.		
<b>CEPI Cartonboard</b>	CEPI Cartonboard is the trade association for the European pulp and paper industry. The organization represents companies that manufacture solid bleached sulphite, solid bleached sulphate, folding carton and white lined chipboard in Europe.		✓
<b>EUROPEN</b>	The European Organization for Packaging and the Environment (EUROPEN) is an industry organization representing the packaging supply chain in Europe on topics related to packaging and the environment.		
<b>Fibre Box Association (FBA)</b>	FBA works on issues of common interest and technical challenges relating to corrugated packaging and promotes the overall well-being of the corrugated industry.	✓	✓
<b>Industrial Energy Consumers of America (ICEA)</b>	IECA is an organization that promotes the interests of manufacturing companies for which the availability, use and cost of energy, power or feedstock plays a significant role in their ability to compete in domestic and world markets.		✓

Organization	Description	Governance Level	Project / Committee Level
<b>National Association of Manufacturers (NAM)</b>	NAM is an advocacy group that represents small and large manufacturers in every industrial sector and in all 50 U.S. states.	✓	✓
<b>National Council for Air and Stream Improvement (NCASI)</b>	NCASI is an independent, non-profit research organization that focuses on environmental and sustainability topics relevant to forest management and the manufacturers of forest products.	✓	✓
<b>Paper and Packaging Board (P+PB)</b>	The P+PB is an Agricultural Promotion Group (APG) designed to promote the use of paper products and paper-based packaging by highlighting the value they bring to our daily lives.	✓	✓
<b>Paper Recycling Coalition (PRC)</b>	PRC represents the interests of the 100 percent recycled paperboard and containerboard industries.		✓
<b>Pulp and Paper Safety Association (PPSA)</b>	PPSA is devoted to the continuous improvement of safety throughout all aspects of the paper industry.	✓	✓
<b>Recycled Paperboard Technical Association (RPTA)</b>	RPTA is dedicated to the improvement and use of recycled paperboard and related products, and provides companies that manufacture products containing a significant percentage of recycled fiber with a legal forum to discuss shared technical issues and interests.	✓	✓
<b>Sustainable Packaging Coalition (SPC)</b>	SPC is an industry working group that endeavors to build packaging systems that encourage economic prosperity and a sustainable flow of materials.	✓	✓
<b>U.S. China Business Council (USCBC)</b>	USCBC is a private, non-partisan, non-profit organization of American companies that do business in China.	✓	✓
<b>U.S. Brazil Business Council (USBBC)</b>	USBBC is a business advocacy organization dedicated to strengthening the economic and commercial relationship between the United States and Brazil.	✓	✓
<b>U.S. India Business Council (USIBC)</b>	USIBC is the premier business advocacy organization, comprised of 350 top-tier U.S. and Indian companies advancing U.S.-India commercial ties.		

## Strategy

### **102-14: Statement from Senior Decision-Maker**

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 page 3.

### **102-15: Key Impacts, Risks and Opportunities**

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 page 17.

## Ethics and Integrity

### **102-16: Values, Principles, Standards and Norms of Behavior**

At WestRock, we are committed to operating our business using our corporate values and behaviors that are guided by the highest standards of ethics and integrity. Our values — Integrity, Respect, Accountability and Excellence — provide the foundation for our engagements with customers, coworkers, investors, suppliers and the communities where we live and work. Our behaviors are the actions we will take to achieve our vision to become the premier partner and unrivaled provider of winning solutions to our customers. These behaviors involve communicating the why, aligning goals, empowering coworkers and recognizing performance. The *WestRock Code of Conduct* supports our values and behaviors, establishes expectations for employee conduct and solidifies our commitment to compliance with the laws and regulations applicable to our business.

## Governance

### **102-17: Mechanisms for Advice and Concerns About Ethics**

Employees who have ethics concerns or want to report a violation can contact the WestRock Compliance Line by mail, email or phone 24 hours a day, 7 days a week. Contact information for the Compliance Line is posted at each facility, and native-language speakers are available to assist non-English speaking callers. Callers have the option to remain anonymous. WestRock takes all reports of violations seriously, and each report is investigated and resolved appropriately.

### **102-18: Governance Structure**

See page 15 of our 2018 [Proxy Statement](#).

### **Director Nomination Process**

See pages 8-9 of our 2018 [Proxy Statement](#).

### **102-20: Executive-Level Responsibility for Economic, Environmental and Social Topics**

WestRock's Chief Sustainability Officer (CSO) is responsible for establishing the company's sustainability strategy and working with the company's executives to drive implementation of sustainability goals and initiatives throughout the organization. Our CSO reports to the company's Chief Executive Officer.

## Stakeholder Engagement

### 102-40: List of Stakeholder Groups

To achieve our vision of becoming the premier partner and unrivaled provider of winning solutions for our customers, we continually evaluate our business through the lens of our key stakeholders, including communities, customers, employees, governments and governmental agencies, investors, non-governmental organizations and suppliers. WestRock frequently engages with governmental entities at the international, federal, state and local levels and various trade associations on matters of public policy and advocacy relevant to the paper and packaging industry. Through direct interaction and the WestRock Foundation, the company and its team members support community service and charitable organizations. The Foundation also funds projects in the areas of sustainable communities, education and the environment.

### 102-41: Collective Bargaining Agreements

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 page 12.

### 102-42: Identifying and Selecting Stakeholders

We engage with stakeholders who impact, or are impacted by, all aspects of our business: financial, commercial and operational (e.g., environmental, safety). Exchanging feedback with our stakeholders on a wide variety of issues enables us to remain engaged on key areas of interest for all parties.

### 102-43: Approach to Stakeholder Engagement

We engage with stakeholders on an ongoing basis and in a variety of ways, including stakeholder meetings, customer satisfaction surveys, employee engagement surveys, sales contacts, meetings, conferences and social media.

### 102-44: Key Topics and Concerns Raised

In October 2017, WestRock convened a group of our key customers, NGOs, internal business leaders and other stakeholders to discuss sustainability issues related to our business. We also used this forum to elicit stakeholder feedback on WestRock's sustainability platform.

Our stakeholders identified development of the circular economy as the topic of greatest importance to them, as well as the area with the greatest potential opportunity for the company given our integrated recycling infrastructure. Our stakeholders emphasized that recovering paper-based packaging and providing the means to turn it into new paper products — at our own mills or other facilities — is a major strength for WestRock.

One of the primary ways we believe we can further the development of the circular economy is by combining our in-depth recycling and innovation capabilities to explore the use of alternative packaging fibers and coatings. We are also assessing opportunities to expand the range of packaging materials that can be recycled. In 2018 we began accepting foodservice packaging at our 100 percent recycled paperboard mills. This decision was based in part on earlier collaborative work with the City of Chattanooga and the Foodservice Packaging Institute on the addition of take-out food containers to their curbside collection. These projects, one of which won the American Forest & Paper Associations' 2018 Leadership in Sustainability Award, are examples of how we are building foundational experience for the next phase of our work on the circular economy.

Another topic of critical importance to our stakeholders relates to responsible fiber sourcing and certified land. Our stakeholders indicated they would like to know more about the benefits of responsible fiber sourcing beyond traceability of fiber from the forest to the finished product. They were very interested in the ecological value of responsibly managed forests, including how they promote biodiversity, protect watersheds and sequester carbon, and suggested that WestRock has an opportunity to enhance the public’s understanding in this area.

Other areas of opportunity identified by our stakeholders include refining certain of our existing sustainability goals to include quantitative objectives where applicable, as well as enhancing the amount of data we disclose in certain areas. WestRock has attempted to address the findings from its stakeholder workshop by expanding certain disclosures in this report, and we will continue to work with our business leaders and stakeholders to address other areas of opportunity.

## Reporting Practices

### 102-45: Entities Included in the Consolidated Financial Statements

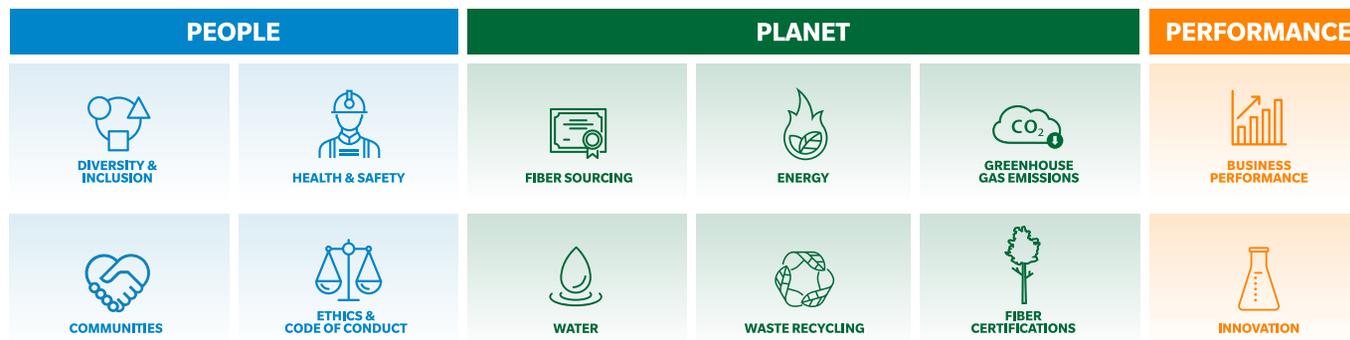
See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 pages 27, 28, 29.

### 102-46: Defining Report Content and Topic Boundaries

Our sustainability platform includes 18 sustainability goals that support our social, environmental and economic pillars. These goals complement our commitment to the American Forest & Paper Association’s Better Practices, Better Planet 2020 initiative and address priority sustainability issues relating to business performance, customers, team members, communities and our supply chain. We have integrated feedback from key internal and external stakeholders into our sustainability strategy and goals. Additional information on that feedback can be found in disclosure 102-44.

### 102-47: List of Material Topics

**Figure 1. Material Sustainability Topics**



**102-48: Restatements of Information**

None.

**102-49: Changes in Reporting**

This is WestRock's second GRI report. Our inaugural report, released in March 2017, followed the GRI G4 guidelines. We have updated our reporting process to follow the most current GRI Standards. Our Material Topics and their boundaries have not changed, but we will continue to evaluate new issues that could become material to WestRock.

**102-50: Reporting Period**

The reporting period for this report is FY17 and FY18

**102-51: Date of Most Recent Report**

March 2017

**102-52: Reporting Cycle**

Biennial

**102-53: Contact Point for Questions Regarding the Report**

Please visit our [website](#) and submit a request to provide feedback or get additional details about the topics covered in our report.

**102-54: Claims of Reporting in Accordance with the GRI Standards**

This report has been prepared in accordance with the GRI Standards: Core option.

**102-55: GRI Content Index**

FY17 and FY18 data (October 1, 2016 – September 30, 2018)

**102-56: External Assurance**

This report is not externally assured but has undergone a review by WestRock's internal audit department.

## Specific Standard Disclosures

### Performance

#### 201 Economic Performance

##### Management Approach

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 page 4.

##### 201-1: Direct Economic Value Generated and Distributed

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 page 30.

##### 201-2: Financial Implications and Other Risks and Opportunities Due to Climate Change

See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 pages 10, 120.

#### 205 Anti-Corruption

##### Management Approach

WestRock is committed to honest and ethical business practices, and takes a proactive approach to preventing corruption. Our governing principles for ethical business conduct are reflected in our *WestRock Code of Conduct* and *Anti-Corruption Policy*. We reinforce our policies with employee training programs on business ethics and conduct regular assessments of our compliance with anti-corruption laws.

We also take steps to ensure that our suppliers conduct business with integrity and in a manner that minimizes the risk of corruption. Global risk assessments are conducted throughout the year, and we have robust policies and procedures in place to protect against corrupt behavior by our intermediaries. All suppliers are required to comply with the *WestRock Supplier Principles of Conduct*, which prohibit bribery, kickbacks, collusive bidding, price fixing and other unfair trade practices.

##### 205-1: Operations Assessed for Risks Related to Corruption

Approximately 90 percent of our business operations were assessed in FY17 and FY18 for anti-corruption through annual interviews with leadership and assessments by our compliance committees. We also conducted site-specific reviews of approximately 75 of our operating facilities.

### **205-2: Communications and Training About Anti-Corruption Policies and Procedures**

The *WestRock Code of Conduct* and *Anti-Corruption Policy* are the primary means of communicating our expectations for employee conduct. All salaried employees are required to complete annual training on the Code, and employees at risk take annual training on bribery and corruption. Our training program includes knowledge testing, and employees are required to affirm their understanding of the Code and anti-corruption policies. Our Board of Directors reviews and approves the *WestRock Code of Conduct* annually and has received anti-corruption training delivered by an external, national expert in the subject.

In addition to our *WestRock Code of Conduct* and *Anti-Corruption Policies* for employees, we also have *Supplier Principles of Conduct* for our Suppliers. WestRock requires its suppliers to comply with applicable laws and regulations of the countries where they do business, without the use of forced labor or child labor. The *WestRock Supplier Principles of Conduct* can be found on our [website](#).

## **206 Anti-Competitive Behavior**

### **Management Approach**

WestRock maintains a rigorous program of global compliance with competition laws. The program includes:

- Firm and visible leadership commitment to compliance;
- Strong policies tailored to our business, including requiring written reports of contacts with competitors and restrictions on technical visits to competitor operations;
- Annual mandatory electronic or live compliance training;
- Close monitoring of antitrust controls at trade associations, including withdrawal when our standards are not met;
- Risk assessments that recently included a program audit by an international accounting firm and Asia Pacific and EU site audits by the chief compliance officer; and
- Constant monitoring, advice and review by expert antitrust counsel in the legal department.

### **206-1: Legal Actions for Anti-Competitive Behavior, Anti-Trust and Monopoly Practices**

WestRock is a defendant in lawsuits arising out of the conduct of our business, some of which may involve allegations of anti-competitive behavior. While the ultimate results of such suits or other proceedings cannot be predicted with certainty, we believe the resolution of these matters will not have a material adverse effect on our consolidated financial condition, results of operations or cash flows. Additional information about WestRock's litigation matters is provided in our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018.



WestRock maintains a rigorous program of global compliance with competition laws.

## Innovation

### Management Approach

We believe sustainability drives innovation, for us and for our customers. Designing products that use renewable fiber, optimize the use of materials, and are recyclable or compostable at the end of their useful lives benefits the environment and is good for our company and customers.

We are a packaging partner to some of the world's most admired brands, and our customers look to us not only to help them reduce environmental impacts, but also to protect their products, position their brands for success and enable their growth. The mission of our research and development team is to facilitate that growth by identifying and expanding market opportunities and enhancing operating performance. Our product innovation experts work with our businesses throughout the world to develop products that meet our customers' sustainability and other needs.

Our [insights-based](#) approach to design enables us to solve complex packaging problems while improving the sustainability profile of our products:

- We have one of the broadest substrate offerings in the industry with a product mix that includes coated and uncoated virgin and recycled paperboard, as well as multiple grades of linerboard and medium. Our paperboard innovation group is focused on reducing the amount of fiber needed to deliver equivalent strength and packaging performance.
- Our design process focuses on appropriate material selection and the creation of packaging that delivers the best functionality while minimizing waste.
- Many customers are interested in reducing their packaging's carbon footprint, and our innovation team is positioned to help them design reduced-footprint packaging solutions for commercial implementation.
- We also employ state-of-the-art printing and finishing technologies with sustainable inks, coatings and graphic enhancements that deliver in-store impact.
- We continue to push the limits of paperboard as a sustainable alternative to various packaging materials, including plastics, as well as to enhance the sustainability of existing paperboard packages through coating development and expertise.

We partner with our customers and other stakeholders throughout the packaging supply chain to develop and apply state-of-the-art design principles and technology to improve the overall sustainability of our packaging solutions. In FY17 we launched 18 new products with defined sustainability benefits, and 26 were launched in FY18.

The WestRock Innovation Council is a cross-functional team of business and research experts that works to ensure products are developed in alignment with business strategy and sustainable design principles. The Council conducts quarterly reviews of our key projects with major customers that are aimed at improving the sustainability of their packaging.

## Planet

### 301 Materials

#### Management Approach

One of the key inputs to our manufacturing process is virgin fiber. Our commitment to sustainable forestry includes a well-defined virgin fiber procurement program. Our professional foresters work directly with landowners to understand their forest management objectives and help them achieve their goals. When we buy from wood suppliers, we require them to meet environmental, social and legal standards to ensure that the fiber we utilize is responsibly sourced. We hold ourselves and our procurement organization to the highest standards of responsibility. All 12 of our North American virgin fiber sourcing regions are certified to the SFI® 2015-2019 standard, and our forestland in Brazil is certified to the Brazilian Forest Certification Programme (CERFLOR®), PEFC™ and FSC® standards. More than 85 percent of our wholly owned manufacturing facilities are chain-of-custody certified to the SFI®, PEFC™ and FSC® standards.

We believe the most sustainable approach to fiber sourcing is a balanced one. WestRock operates one of the largest recycling businesses in North America, and many of our mills use a combination of virgin and recycled fiber. We also have mills that make 100 percent recycled paperboard.

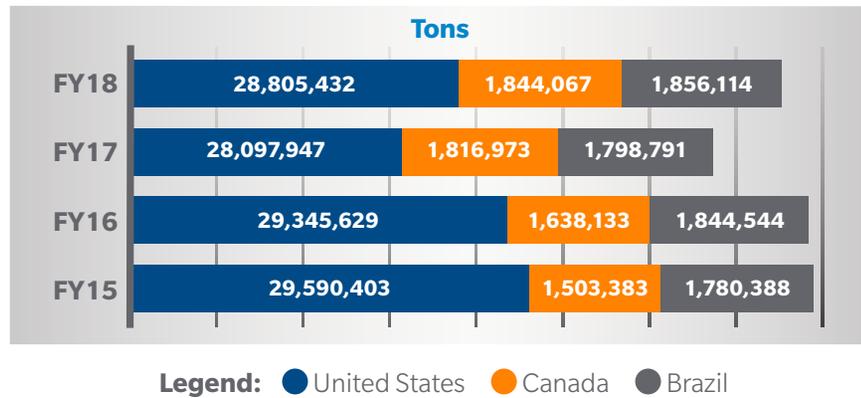
In addition to our fiber inputs, WestRock relies heavily on other raw materials including water and various chemicals. We obtain water from surface water bodies and groundwater, and we also purchase water. Increasing water recycling within our manufacturing processes and reducing water use whenever feasible are key focus areas. Our mills, folding carton and corrugating operations use chemicals such as caustic soda, corn starch, binding agents and bleaching agents. We utilize supplier *Supplier Principles of Conduct* to ensure the materials used in our manufacturing operations are responsibly sourced, in accordance with standards for environmental protection, human rights, labor and social norms, as well as anti-discrimination and anti-corruption policies.

**301-1: Materials Used by Weight or Volume**

**301-2: Recycled Input Materials Used**

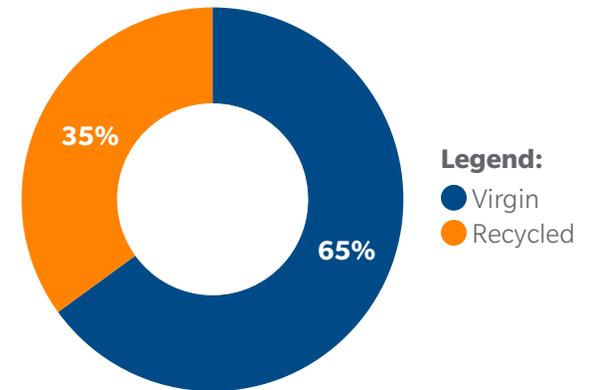
**301-3: Reclaimed Products and Their Packaging Materials**

**Figure 2. Tons of Virgin Wood Fiber Purchased**



**Figure 3. Fiber Mix — FY18**

All WestRock Mills



Our fiber mix in FY17 was the same as FY18.

**Figure 4. Recyclable Tons Managed**

Recyclables	FY15 (Tons)	FY16 (Tons)	FY17 (Tons)	FY18 (Tons)
Fiber	6,740,000	7,600,000	7,550,000	7,655,000
Plastic	130,000	150,000	120,000	155,000
Aluminum	30,000	50,000	30,000	20,000
<b>Total</b>	<b>6,900,000</b>	<b>7,800,000</b>	<b>7,700,000</b>	<b>7,830,000</b>

**Figure 5. Recycled Fiber Used**

Tons Used by WRK	FY15 (Tons)	FY16 (Tons)	FY17 (Tons)	FY18 (Tons)
Recycled Fiber	4,300,000	4,900,000	4,700,000	4,900,000
<b>Percent of Total Fiber Tons Managed</b>	<b>63.8%</b>	<b>64.5%</b>	<b>62.2%</b>	<b>64.4%</b>

WestRock recycled more than 7,600,000 tons of fiber in FY18. 64 percent of this fiber was reused in our own operations, the remainder was sold to other organizations.

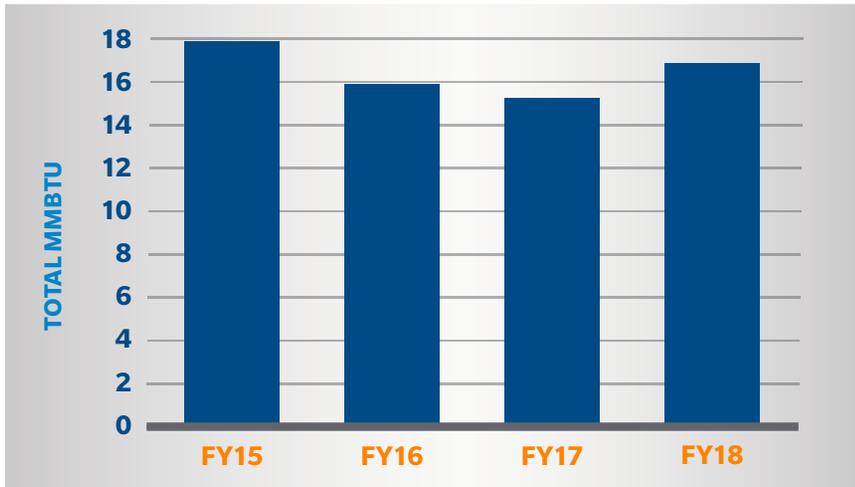
## 302 Energy

### Management Approach

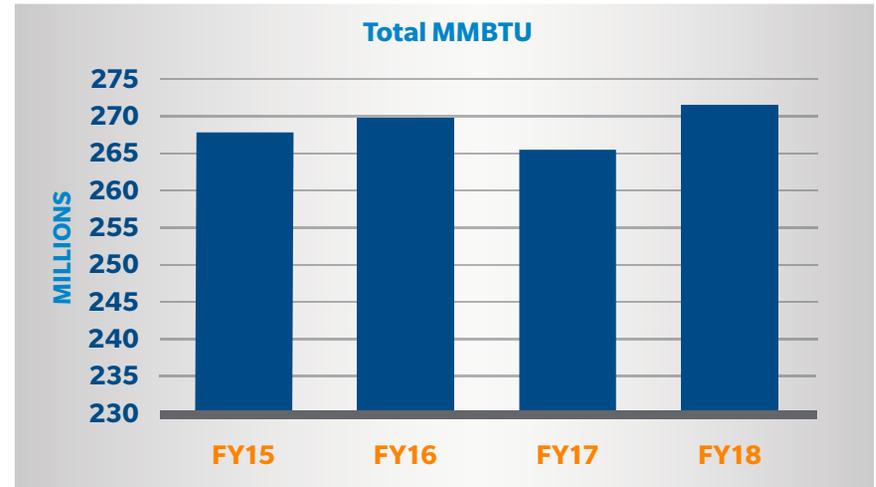
WestRock’s internal energy group works closely with our manufacturing sites to manage fuel use and cost. While the price of natural gas, coal, oil, electricity and biomass can fluctuate significantly, WestRock seeks to optimize costs while prioritizing fuel reliability. Our mills generate most of their own steam and electricity by using combined heat and power systems fueled predominantly with renewable biomass. WestRock maps energy use throughout our mill system with a goal of increasing energy efficiency, lowering energy costs and minimizing environmental impacts. WestRock’s progress in these initiatives is tracked against our goal of achieving a 10 percent reduction in purchased fuels per ton of production by 2025 from a 2015 baseline.

### 302-1: Energy Consumption within the Organization

**Figure 6. Total Purchased Electricity**  
All Manufacturing Locations

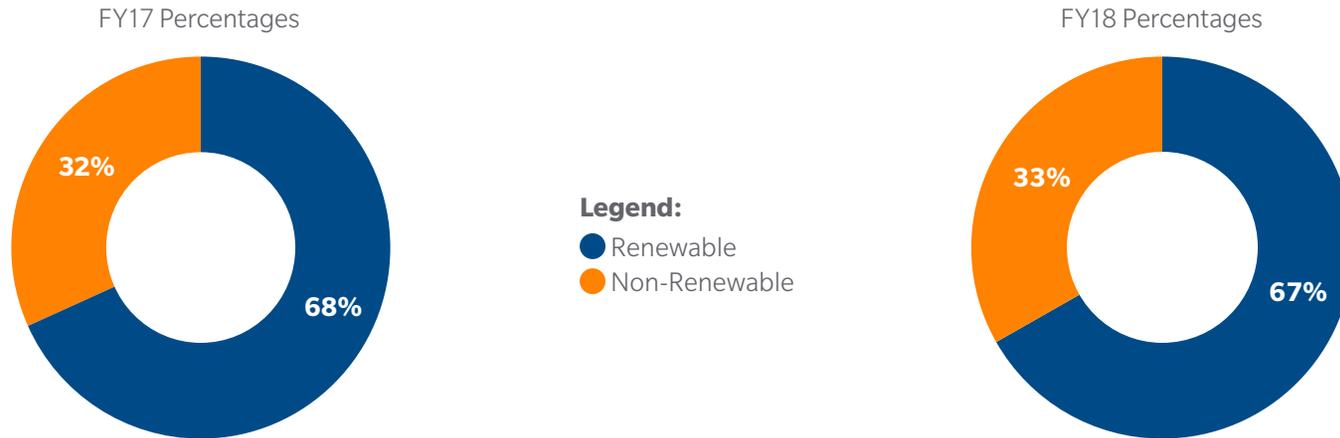


**Figure 7. Total Direct Energy Used**  
All Manufacturing Locations



**Figure 8. Total Energy Mix**

Scope includes all WestRock manufacturing locations.



**302-3: Energy Intensity**

**302-4: Reduction of Energy Consumption**

As of the end of FY18, WestRock had reduced total fossil fuel use by approximately six percent from the baseline year of FY15. We were able to achieve these results through the implementation of major capital projects at our Covington, Virginia and Demopolis, Alabama mills, that replaced coal with highly efficient combined heat and power systems powered with renewable biomass fuels. On an intensity basis, our energy efficiency, measured as million BTU’s consumed per ton of production, decreased by approximately four percent during the period FY15 to FY18. This was due to increased natural gas usage in FY18.

Figure 9. Mill Fossil Fuel Use

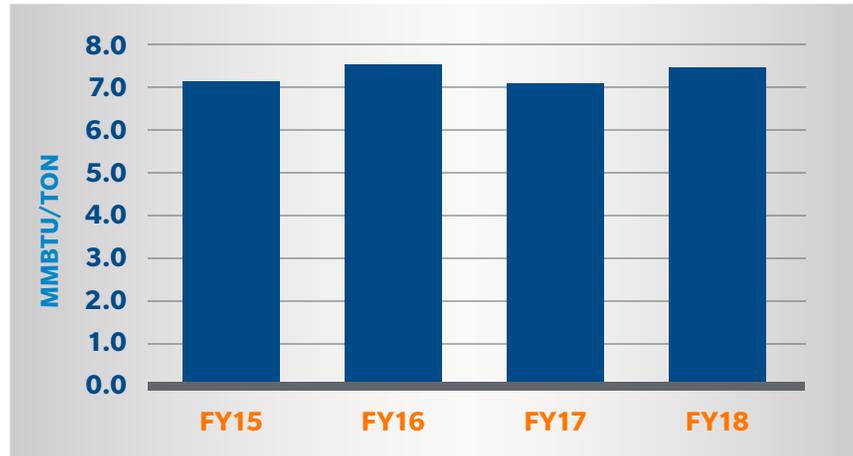
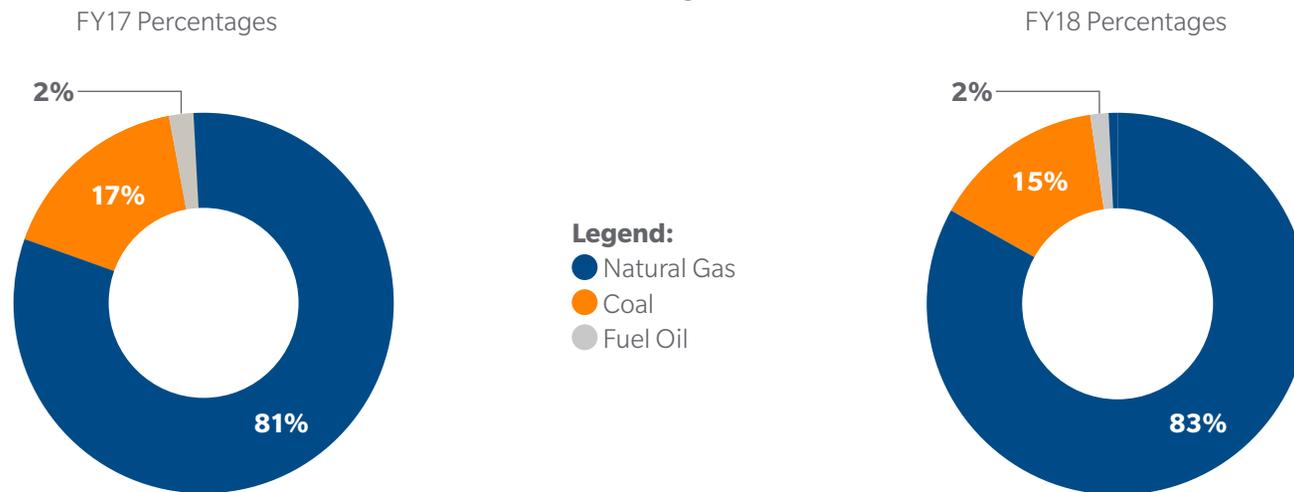


Figure 10. Mill Purchased Fossil Fuel Mix

All Manufacturing Locations



## 303 Water

### Management Approach

A clean and abundant supply of water is critical for our operations, and we monitor and seek to reduce the use of water wherever feasible. In 2015 we established our goal to map the water use in our most water-intensive manufacturing operations by the end of FY18 and develop water reduction plans for strategic watersheds by 2020. We have mapped the water risks at each of our pulp and paper mills using the World Resource Institute’s Aqueduct tool. During FY17 and FY18, WestRock developed site-specific water reduction plans for its largest groundwater users in Virginia and Florida, meeting the 2018 aspect of our water goal. We will continue to develop water reduction plans using the results from our water risk evaluation.

### 303-1: Water Withdrawal by Source

Figure 11. Mill Water Sources

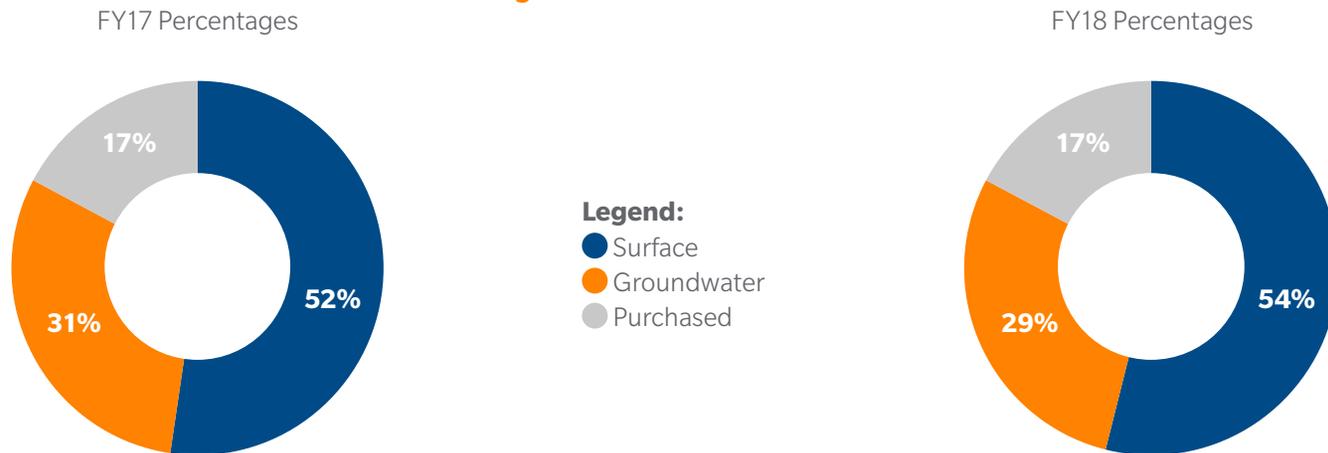
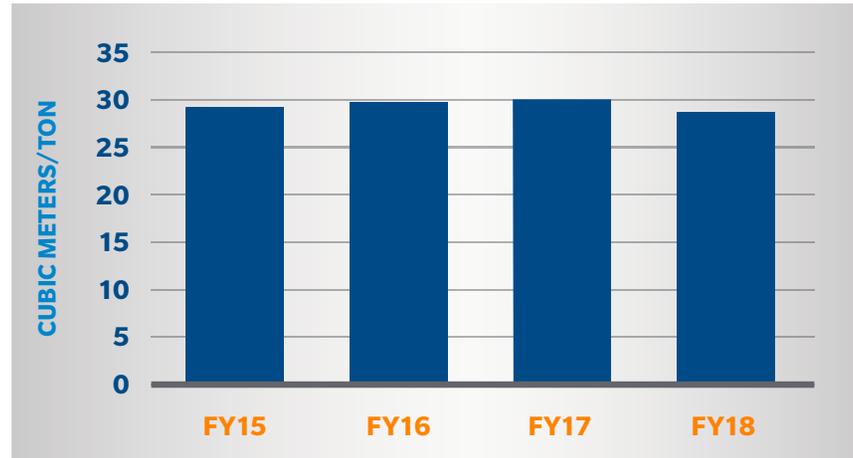


Figure 12. Mill Water Use  
(Effluent)



## 304 Biodiversity

### Management Approach

We support responsible land management practices that integrate the growing and harvesting of trees with the protection and conservation of soil, air and water quality; biological diversity; wildlife and aquatic habitats; recreational and aesthetic properties; and forests with high conservation value. Our landowner outreach program encourages forest landowners to adopt recognized forest management standards and helps educate them on land management practices that promote long-term forest productivity and protect biological diversity.

WestRock maintains two Independently Managed Group (IMG) certificates through the American Tree Farm System® (ATFS®), which represents more than 250 landowners and 350,000 acres in the United States. The 54,505-hectare (134,684 acres) land base we own in Brazil is certified to the Forest Stewardship Council® (FSC®) and CERFLOR® standards.

Our commitment to promoting healthy and productive forests is set forth in our Sustainable Forestry and Virgin Wood Fiber Procurement Policy, which is available on our [website](#).

**304-1: Operational Sites in or Near Protected Areas or Areas of High Biodiversity Value**

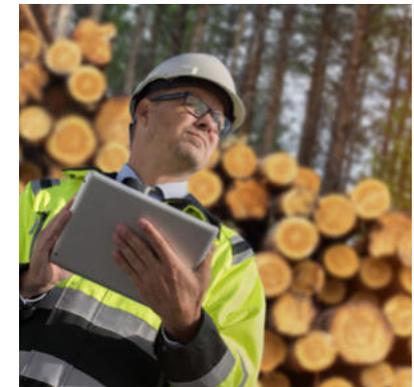
WestRock owns and manages 54,505 hectares (134,684 acres) of forestland in the Brazilian states of Santa Catarina and Paraná. About 53 percent of this land base is used to produce pulpwood for the WestRock paper mill in Tres Barras, and the remainder is protected as permanent preservation areas or maintained as native forests in legal reserves. These reserves meet the requirements of Brazilian Forest Law and the forest management requirements of our Forest Stewardship Council® (FSC®) certification.

Monitoring of the fauna and flora on company owned lands in Brazil has identified the presence of a wide variety of animal and plant species. The legal reserves and permanent preservation areas within our Brazilian land holdings are delineated in our Geographic Information System (GIS) and are protected and monitored during all forest operations. We have a comprehensive forest management plan, which details the activities to be carried out for each individual forest stand. Annual fauna and flora surveys, as well as environmental monitoring of water resources and soil conservation, demonstrate the effective implementation of our forest management plan.

**304-3: Habitats Protected or Restored**

The WestRock Foundation made a multi-year commitment to The Nature Conservancy (TNC) that will permanently protect longleaf pine and hardwood forestlands across eastern Virginia. TNC is targeting 2,900 acres of forestland along the Nottoway River and nearby Big Woods Conservation Area, with the aim of protecting priority river floodplain forest and restoring longleaf pine habitats to advance recovery of some of Virginia’s rarest wildlife species, including the red-cockaded woodpecker and bobwhite quail.

The WestRock Foundation has also partnered with TNC and the American Forest Foundation (AFF) to support projects in the Cumberland Plateau, an area that contains the world’s longest expanse of hardwood-forested plateau. These projects help private landowners in the Cumberland Plateau actively manage their forests. The partnerships will also promote hardwood habitat improvements, forest biodiversity and watershed management.



WestRock is committed to sustainable forestry practices that preserve forest repositories of biodiversity.

**The following projects have benefited from WestRock’s pledge to TNC:**

**Floodplain forest preservation in the Nottoway River forest corridor**

The Conservancy identified two forest protection projects along the Nottoway River in Sussex and Southampton Counties in Virginia. The floodplain areas of these properties provide spawning and nursery habitat for migratory fish and important breeding and stopover habitat for migratory songbirds. The total land area under consideration is approximately 300 acres.

**Forest management activities across priority conservation lands to aid in the recovery of longleaf pine and declining wildlife species**

The TNC is working with the Airport 4-H Camp near the Virginia Piney Grove Preserve to develop and implement a forest management plan for 140 acres of mature pine and hardwood timberland owned by the Camp. Timber harvests and other management activities, which include tree planting and prescribed burning, will be incorporated into the Camp’s year-round educational programs which reach 20,000 visitors per year.

**The Nature Conservancy’s Working Woodlands program**

The TNC’s Working Woodlands program empowers private landowners to conserve their lands as working forests while improving forest management. With funding from WestRock, TNC enrolled an approximately 6,000-acre tract in the Working Woodlands program in White County, Tennessee in 2017. A forest management plan was completed for these lands, resulting in FSC® certification. Shortleaf pine habitat restoration utilizing silvicultural treatments and prescribed fire is underway with approximately 200 acres currently in active restoration. TNC is continuing to work with the landowner on developing a carbon offset project and protection of the tract.

**The following projects have benefited from WestRock’s partnership with AFF:**

**Establish, restore or enhance 450 acres of riparian forest.**

Restored and enhanced 197 acres of riparian forest land in Lincoln, Giles, Moore and Franklin Counties, Tennessee.

**Engage in extensive, multi-touch marketing to 1,000 landowners in priority areas**

First mailer reached a total of 4,000 landowners in Bedford, Coffee, Franklin, Giles, Lincoln, Marshall and Maury Counties, Tennessee.

**Provide technical training to 30 area foresters**

Held a workshop in 2017 in Lincoln County, Tennessee. Trained 30 natural resource professionals on topics including at-risk species and farm bill programs, as well as how to move unengaged landowners to action for better management of their property.

**Host three landowner-focused educational events with a combined attendance of at least 500 landowners**

Hosted one field day in 2018 in Lincoln County, Tennessee. The field tour featured three sites where landowners have installed riparian buffers.

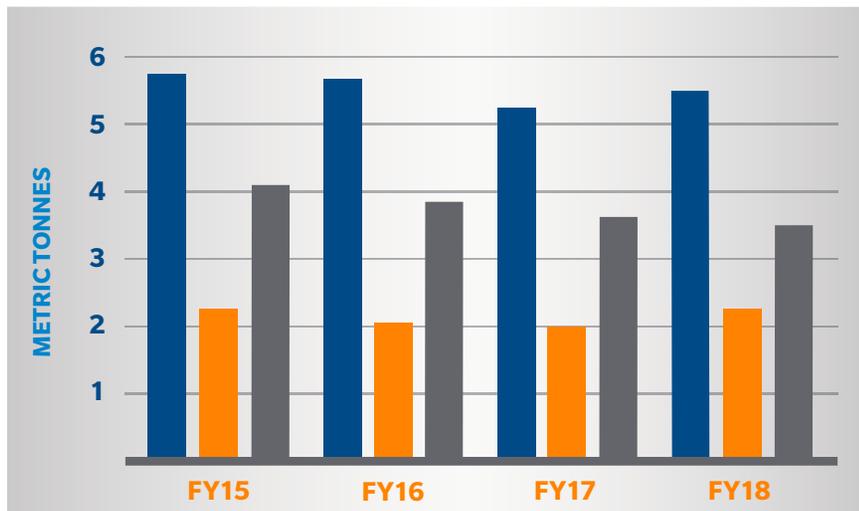
## 305 Emissions

### Management Approach

WestRock has established a sustainability goal to reduce CO<sub>2</sub>e emissions per ton of production by 20 percent from a 2015 baseline by 2025. A key element in our strategy for reducing greenhouse gases (GHG) is leveraging what we do best — using biomass. WestRock’s integrated kraft paper mills, the company’s most energy-intensive manufacturing facilities, burn renewable biomass to generate more than 60 percent of their energy needs within our Brazilian land holdings. Most of these facilities also self-generate the steam and power needed for their manufacturing processes using combined heat and power (CHP) or “cogeneration” systems. These thermodynamically efficient systems generate electricity and useful thermal energy in a single, integrated process.

**305-1: Direct (Scope 1) GHG Emissions;**  
**305-2: Indirect (Scope 2) GHG Emissions**

**Figure 13. Scope 1 and 2 GHG Emissions**  
 (Millions)

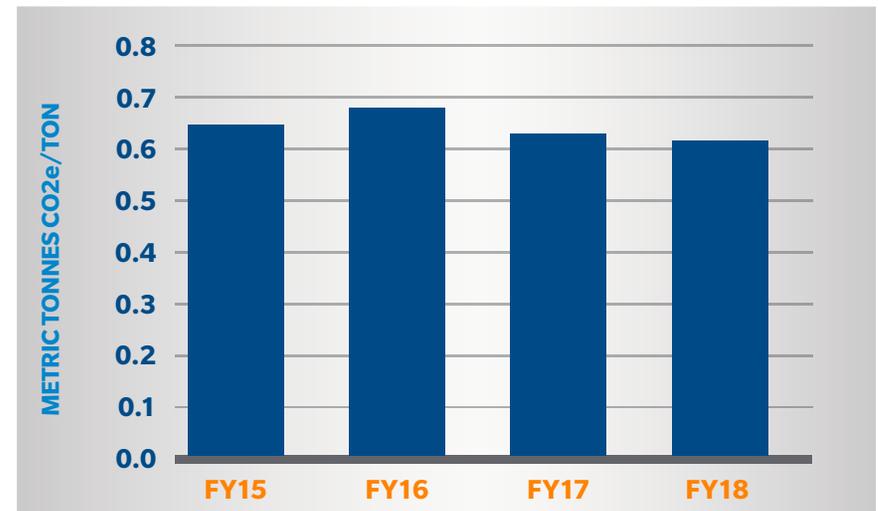


**Legend:**

- Scope 1 — Direct Emissions
- Scope 2 — Indirect Emissions (location)
- Scope 2 — Indirect Emissions (market)

**305-4: GHG Emissions Intensity**

**Figure 14. CO<sub>2</sub>e Emissions Intensity**



This goal and its data are specific to WestRock’s integrated kraft mills and account for GHG from the use of purchased fuels and electricity. The data has been normalized by tons of paperboard production.

**305-5: Reduction of GHG emissions**

As of the end of FY18, WestRock had reduced absolute GHG emissions by approximately nine percent from our baseline year of FY15. On an intensity basis, we reduced our GHG emissions by approximately six percent per ton of production during the period FY15 to FY18. These reductions were achieved through the implementation of mill capital projects that replaced fossil fuels with renewable biomass. The reductions also reflect the company’s investment in infrastructure to utilize natural gas.

**305-6 Nitrogen Oxides(NO<sub>x</sub>) and Sulfur Dioxide (SO<sub>2</sub>)**

Air emissions of nitrogen oxide (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) are associated with the pulp and papermaking process. During the period 2015 to 2018, WestRock has reduced emissions of NO<sub>x</sub> from its largest Kraft paper mills by nearly four percent. These facilities have decreased SO<sub>2</sub> emissions by more than 39 percent during this same period. WestRock closely monitors emissions of NO<sub>x</sub> and SO<sub>2</sub>, and we are committed to controlling emissions of these compounds across our global manufacturing sites.

**Figure 15. Kraft Mill Emissions of NO<sub>x</sub> and SO<sub>2</sub>**

2015 Tons		2016 Tons		2017 Tons		2018 Tons	
NO <sub>x</sub>	SO <sub>2</sub>						
20,521	14,938	20,317	11,521	19,669	9,588	19,745	9,057

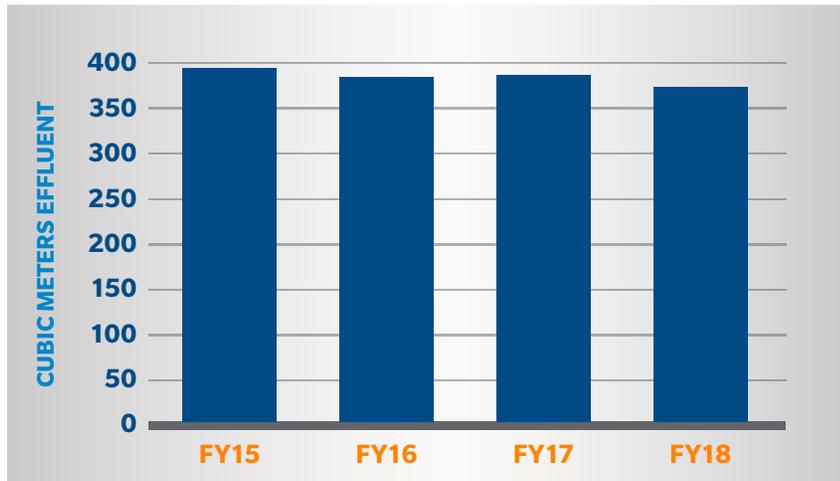
**306 Effluents and Waste**

**Management Approach**

Water withdrawn or purchased by our paper mills is recycled numerous times before it is treated and returned to the environment. Effluent discharges from our mills are generally subject to limitations and controls imposed by government-issued permits. These permits contain restrictions on the nature and characteristics of our wastewater discharges, including limits for biochemical oxygen demand (BOD), total suspended solids (TSS) and a variety of other parameters. WestRock paper mills have programs of extensive, ongoing monitoring and testing to ensure compliance with permit and regulatory limits applicable to their effluent discharges to receiving streams and other waterways.

**306-1: Water Discharge by Quality and Destination**

**Figure 16. Mill Effluent Discharge**  
(Millions)



**Figure 17. Water Quality Indicators**

Total BOD Discharged (Lbs)			
2015	2016	2017	2018
17,820,143	17,535,983	16,432,541	18,218,851

Total TSS Discharged (Lbs)			
2015	2016	2017	2018
24,906,252	24,918,095	23,688,051	23,805,424

This data is specific to WestRock integrated kraft mills.

**307 Environmental Compliance**

**Management Approach**

WestRock is committed to compliance with all applicable environmental laws and regulations, and we approach our environmental and product stewardship responsibilities with the highest standards of ethics and integrity. Our dedication to environmental and product stewardship also means that we:

- Include consideration of environmental and product stewardship issues in our business strategies and initiatives;
- Use raw materials, energy and water in our manufacturing operations as responsibly and efficiently as possible;
- Design and manufacture products that meet our customers' needs and expectations for product safety;
- Reduce waste and seek ways to maximize recycling opportunities for our products and manufacturing residuals whenever possible;
- Assist our customers in achieving their environmental sustainability goals related to paper and packaging;
- Act as good environmental stewards in the communities where we operate;

- Conduct ongoing educational programs for our coworkers to promote awareness and accountability on environmental and product stewardship matters;
- Regularly report our environmental performance to our board of directors, company leadership and internal and external stakeholders; and
- Continuously improve our environmental and product safety processes, management systems and performance.

### **307-1: Non-Compliance with Environmental Laws and Regulations**

No material environmental enforcement actions were commenced against WestRock during FY17 or FY18. See our [Annual Report](#) on Form 10-K for the fiscal year ending September 30, 2018 pages 8-11.

## **Virgin Fiber Sourcing**

### **Management Approach**

WestRock is committed to maintaining certifications to the Sustainable Forestry Initiative® (SFI®), the Forest Stewardship Council® (FSC®), Programme for the Endorsement of Forest Certification (PEFC™), Brazilian Forest Certification Program (CERFLOR®) standards and the American Tree Farm System® Group Certification process. Our commitment to the use of responsible virgin fiber procurement practices are set forth in our Virgin Fiber Sourcing Policy, which is available at [www.westrock.com/sustainability](http://www.westrock.com/sustainability).

Our 2025 sustainability goal for virgin fiber sourcing is to increase our purchases of virgin fiber from lands certified to credible forest management standards by 25 percent from a FY15 baseline. WestRock's ability to meet its 2025 certified fiber goal is influenced by a variety of factors, including the availability of certified land in each market, the price of certified fiber and other market conditions, mill fiber demands and customer requirements. Through increased visibility to certified fiber purchasing data and our ongoing efforts to work with small landowners, we increased our purchases of virgin fiber from lands certified to credible forest management standards by 3.6 percent from our 2015 baseline.

## **People**

### **401 Employment**

#### **Management Approach**

Our people are what differentiates WestRock, and employing talented, diverse, creative and committed coworkers is a key to our success. We want to attract and retain top talent by providing diverse and inclusive global workplaces that are founded on our shared value of Respect. See our Mutual Respect in the Workplace Policy at [www.westrock.com](http://www.westrock.com).

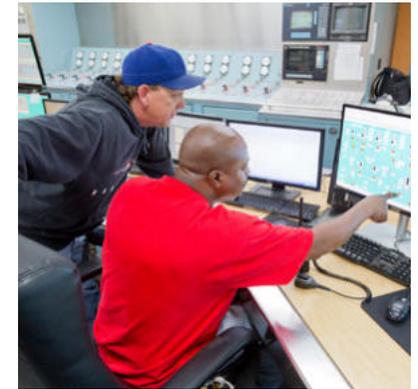
WestRock supports the elimination of human trafficking and slavery from the supply chain, and the transparency of our efforts in this regard are consistent with the requirements of the California Transparency in Supply Chains Act of 2010 and the United Kingdom's Modern Slavery Act of 2015. We do not tolerate human

trafficking, in the U.S. or globally. WestRock expressly prohibits the use of forced labor, including indentured labor, slave labor and any form of human trafficking. See our Anti-Human Trafficking and Human Rights Statement and *Supplier Principles of Conduct* at [www.westrock.com](http://www.westrock.com).

#### **401-2: Benefits Provided to Full-time Employees That Are Not Provided to Temporary or Part-time Employees**

WestRock offers a market-based benefits program that has been designed to attract, reward and retain top talent across the organization. Our benefits also have been tailored to respond to the evolving needs of our diverse workforce. Benefits available to full-time WestRock employees not covered by union contracts include:

- Medical
- Prescription
- Dental
- Vision
- Health Savings Account
- Flexible Spending Account
- Employee Assistance Program
- Short-term Disability
- Long-term Disability
- Vacation
- Flexible scheduling and telecommuting options at our corporate offices
- Tuition reimbursement
- Employee wellness program, including physical and mental health programs and incentives for a healthy lifestyle



Our values — integrity, respect, accountability, excellence — are the foundation for our success.

## **402 Labor Relations**

### **Management Approach**

WestRock respects our employees' freedom of association. Where employees are represented by a legally recognized union or works council, we are committed to establishing a constructive dialogue and bargaining in good faith with their freely chosen representatives. See our [Annual Report](#) on Form 10-K for additional information on WestRock employees and collective bargaining agreements.

#### **402-1: Minimum Notice Periods Regarding Operational Changes**

WestRock adheres to all federal, state and local laws and regulations applicable to an operational closure, regardless of where it is consummated.

## 403 Occupational Health and Safety

### Management Approach

We strive to operate in a way that protects the health and safety of our employees, contractors, visitors and the global communities in which we operate. We comply with all health and safety laws and regulations, and believe it is important that coworkers are not afraid to speak up about safety issues, including injuries and failures to comply with applicable safety regulations. We follow all legal prohibitions for retaliation and grant employees the right to speak about misconduct.

Everyone at WestRock shares responsibility for maintaining a safe and healthy workplace, and each WestRock team member is empowered to stop work to address an unsafe work situation. We believe there is no task so urgent or important that we cannot take the time to do it safely. WestRock established a sustainability target to reduce our OSHA recordable incident rate (RIR) by 25 percent by 2025, from a 2015 baseline. Since 2015, the Company has reduced its OSHA RIR by approximately 1.4 percent.

We are focused on the safety of all of our coworkers every day, and improving safety performance is the cornerstone of our commitment to People. In 2016 we initiated an effort to prevent life-changing events (LCE). LCE are life-threatening or life-altering injuries that have the potential to seriously impact our team members and their families. We are focused on the prevention of LCE through the development of safety leadership capabilities at all levels of the organization, creating a stronger safety culture throughout our global operations and improving our ability to recognize and address precursors that can lead to LCE. WestRock also has developed internal protocols for performing root-cause evaluations of potential LCE to identify precursors to these events, addressing precursors before a serious injury occurs, and sharing information on LCE prevention across our business. Between FY17 and FY18, WestRock did not have any fatalities, and we reduced the number of LCE by approximately 19 percent. While we are pleased with this reduction, we remain committed to our goal of eliminating all LCE.

Safety metrics are reported to our board of directors on a quarterly basis, and this data is used in certain cases in annual performance and compensation evaluations, as well as various local incentive programs.

403-2: Types of Injury and Rates of Injury, Occupational Diseases, Lost Days and Absenteeism and Number of Work-Related Fatalities

Figure 18. OSHA Recordable Incident Rate

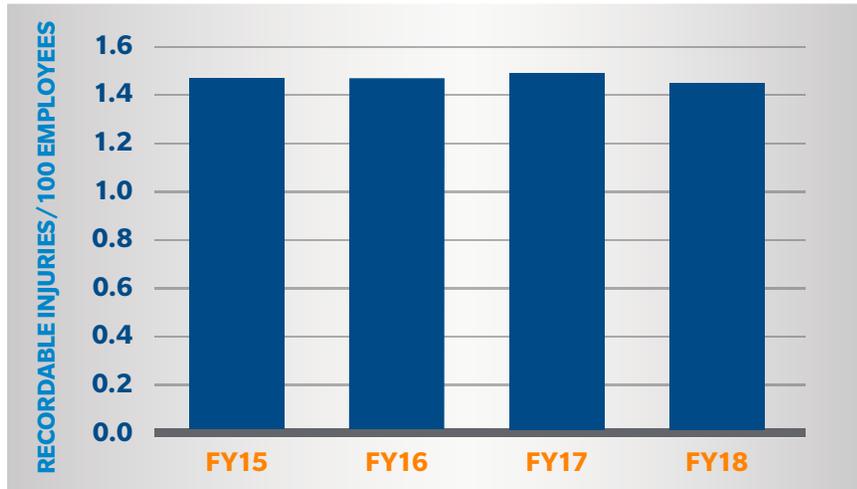
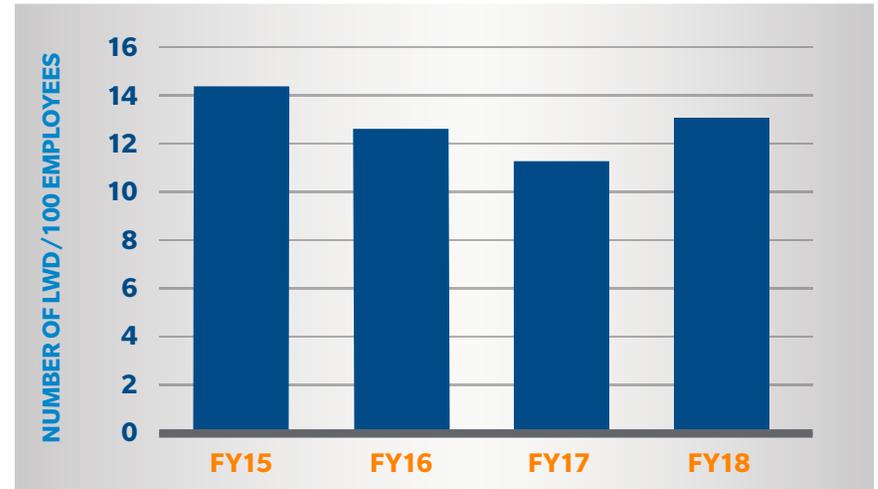


Figure 19. Lost Workday Rate



## 404 Training and Education

### Management Approach

To attract and retain top talent for our workforce, we need to provide coworkers with the training they need to build and grow their careers. Providing a broad range of opportunities for development ensures that our coworkers are more engaged at work, resulting in greater job satisfaction for them and better results for the company and our stakeholders.

WestRock takes the 70/20/10 approach to learning and career development: 70 percent through experiences (on-the-job); 20 percent through relationships (coaching, mentoring and social learning such as volunteer activities, networks or professional groups); and 10 percent through classroom or online training. A variety of platforms for learning are available to accommodate various learning styles and environments, including online platforms, live webinars, traditional-style classroom sessions and on-the-job coaching. Our programs are available to employees at every stage in their careers, from recent graduates to experienced professionals.

## 404-2: Programs For Upgrading Employee Skills and Transition Assistance Programs

We have a dedicated Learning and Development team that creates, promotes and fosters individual and organizational effectiveness by developing and offering innovative and diverse programs in support of our commitment to employee development. WestRock University, our unique in-house learning system, offers a wide range of courses including our General Manager and Sales Manager Colleges, Foundations of Leadership, Conflict Management, WestRock 360 (an interactive learning experience to learn about all the areas of WestRock) and more. Most of these courses are offered in modular form, with group exercises and hands-on simulations to enhance the experience. We also offer a wide range of courses for employees that need specific job training in environmental compliance, product stewardship, safety and forest certifications.

## 405 Diversity and Equal Opportunity

### Management Approach

Diverse perspectives encourage different solutions and inclusion encourages ideas. We welcome new ways of thinking and work hard to cultivate an environment where everyone's voice can be heard. We believe that when we embrace our differences and include everyone, we have the greatest opportunity to deliver value to all our stakeholders.

To foster a diverse and inclusive workplace WestRock encourages participation in our Employee Resource Groups (ERG's), groups of employees that share a common purpose or background. ERG's provide members with the opportunity for career development, community involvement and networking.

WestRock ERGs include the African American Network, the Hispanic Network, Young Professionals Network and the Women's Network. Each ERG has an executive-level champion that provides leadership and support for the group.

We are also focused on creating a more diverse and robust supply chain by increasing our managed spend with diverse businesses and suppliers which include minority, women, small business, veteran and LGBTQ owned businesses. We track our diverse-business spend, encourage buyer/supplier mentorship and support educational development programs for diverse businesses. We recognize and reward top diverse suppliers, and we have identified geographies and commodities where we can grow our relationships with diverse suppliers.

Through our supplier diversity efforts, we have partnered with a variety of minority firms to procure goods and services for our business, which in turn has stimulated their growth. Since 2016, WestRock has established business relationships with more than 2,500 diverse suppliers and has increased its spending by approximately \$350 million. Our goal is to increase our level of spending with diverse vendors to \$1 billion by 2020.



A diverse workforce and inclusive culture creates opportunities for our employees to do their best work.

We have also received external recognition for our supplier diversity efforts:

- 2017 Georgia Minority Supplier Development Council's Rising Star Award
- 2017 Georgia Minority Supplier Development Council's Crystal Award
- 2017 Greater Women's Business Council's Top Corporation Award
- 2018 ConAgra Supplier Diversity Award
- 2018 Georgia Minority Supplier Development Council's Rising Star Award
- 2018 Georgia Minority Supplier Development Council's Corporation of the Year Award

## 412 Human Rights

### Management Approach

See our *Mutual Respect in the Workplace Policy* and our *Anti-Human Trafficking and Slavery Statement* at [www.westrock.com](http://www.westrock.com).

#### 412-1: Operations That Have Been Subject to Human Rights Reviews or Impact Assessment

Through the Sedex global online platform and customer-initiated third-party audits, 116 WestRock sites have undergone self-assessments on labor standards, health and safety, environment and business practices. These sites represent approximately 39 percent of our operating facilities around the world.

Our Brazilian forestry operations are certified to both the FSC® and PEFC™ (CERFLOR®) forest certification standards. These standards include compliance with social requirements and labor practices, in areas such as employee transportation, meals and living areas. In 2018, we conducted three external audits to verify compliance with FSC® and PEFC™ (CERFLOR®) standards for forest management and chain of custody.

#### 412-2: Employee Training on Human Rights Policies or Procedures

See *WestRock's Code of Conduct*, *Mutual Respect in the Workplace* and *Anti-Human Trafficking and Slavery Statement* at [www.westrock.com](http://www.westrock.com). Our *WestRock Code of Conduct* and *Mutual Respect* policy address workplace issues such as discrimination and harassment. Approximately 11,000 employees completed *WestRock's Code of Conduct* training in FY17 and 12,600 employees completed the course in FY18. WestRock employees completed more than 49,000 hours of training on human rights and HR compliance topics over the two-year period.

## 413 Local Communities

### Management Approach

The WestRock Foundation plays an important role in the company's practice of engaging our communities and involving our employees to help shape positive change through donations, grants and volunteerism. The WestRock Foundation provides support in the areas of education, and environment and sustainability. Specifically, we focus on:

- **Education.** The workforce of tomorrow is being shaped today, and we are committed to ensuring it meets the business and operational needs of our industry. We look to partners within our communities to help us achieve a sustainable workforce for years to come.
- **Environment and Sustainability.** By joining forces with organizations focused on water, forest, wildlife diversity and undertaking sustainability projects within our operational footprint, we uphold our commitment to investing in and protecting our natural resources.

We also realize there are many non-profit organizations that do great work to support various causes that ensure residents live in safe, diverse and vibrant communities. That's why we encourage our team members and their families to help us direct some of our funding to organizations they care about. The WestRock Foundation recognizes volunteer service with a grant to the organization through our Grants for Volunteers and Teamwork Matters programs.

#### 413-1: Operations with Local Community Engagement, Impact Assessments and Development Programs

The WestRock Foundation supports organizations that help us meet our strategic objectives. Examples include Junior Achievement and Communities in Schools to align with our focus on education, and The Nature Conservancy and American Forest Foundation to support our goals around environment and sustainability.

We know every community has different needs to make it a great place to live, work, play and do business. We encourage our facilities to identify and participate in activities that will benefit their communities. From food banks to youth sports and community clean-up days, to local schools, fire and rescue, and arts and culture organizations, our locations and team members are proud to give back to the communities they call home.

WestRock has established an Employee Relief Fund (ERF), which is an independent 501(c)(3) organization administered by a board and grant review committee comprised of WestRock team members. The ERF provides financial assistance to employees around the world who have suffered financial hardship due to a natural or man-made disaster. Any WestRock employee impacted by such an event is eligible to apply for a grant from the ERF. Since its inception in 2005, the ERF has provided more than 950 grants totaling more than \$2.3 million. During the 2018 hurricane season, the ERF provided 390 grants totaling more than \$1.1 million to team members in Panama City, Florida, who were impacted by Hurricane Michael.



The WestRock Foundation focuses on providing support in the areas of education and environmental stewardship.

## 415 Public Policy

### Management Approach

WestRock is subject to numerous, complex laws and regulations, and we routinely engage with elected officials and governmental agencies on issues that impact our operations. We believe that participation in the political process is essential to our business because legislative and regulatory decisions have an impact on our ability to make critical business decisions. We also believe it better serves our business interests by creating a more informed and balanced policy-making process.

We hold open houses, conduct facility tours and undertake other outreach activities in an effort to inform elected officials about our business. We also urge our employees to educate themselves on issues that are important to our business.

We encourage membership in the Pulp and Paperworkers Resource Council, a grassroots organization of pulp and paper industry workers that is dedicated to environmental conservation, while taking into account the economic stability of the workforce and surrounding communities.

We strongly believe that active engagement in the political and regulatory processes is an important means of protecting our commercial, employee and stakeholder interests.

### Participation in Trade Associations

WestRock is a member of several trade associations and other organizations that provide information and assistance on public policy issues of concern to our business. We participate in groups such as the American Forest & Paper Association, the National Association of Manufacturers, the American Benefits Council and the US-China and US-Brazil Business Councils not only to influence policy decisions, but to gain information that will help us improve our global operations. We value the diversity of opinions found within these groups and sometimes take positions contrary to those of these organizations when we believe it is the right thing to do.

### Global Activities

WestRock is a global company with operations throughout North America, South America, Europe and Asia Pacific. We work cooperatively with local, regional and national governments in the countries where we operate. From time to time, legislative, regulatory and other political issues may arise in these jurisdictions that affect our operations. After careful consideration and approval of senior management, WestRock may engage in dialogue with government officials on issues that affect our business goals and objectives. We engage in certain political activity and spending outside of the United States as permitted by, and in strict compliance with, applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act.

## **U.S. Political Contributions**

The WestRock Political Action Committee (PAC) is a voluntary, non-partisan political action committee that is registered with the U.S. Federal Election Commission. The PAC allows employees to pool personal, voluntary financial contributions to candidates seeking federal elective office who support issues important to our business, our employees and other stakeholders. The WestRock PAC only makes political contributions to candidates who we believe have integrity and have demonstrated a commitment to ethical political conduct. We also consider the geographical area of the candidate's representation, the candidate's position or voting record on key issues affecting our industry and our company, as well as the candidate's committee assignments and legislative leadership positions.

Employee contributions to the WestRock PAC are voluntary, and no employee is required to participate in or fund the PAC's efforts. WestRock's political spending through the PAC reflects our interests as a company and not those of any individual director, officer or employee. No political spending is given in anticipation of, in recognition of or in return for any official act. All federal political contributions and receipts from WestRock PAC are publicly available [here](#).

## **Contributions to U.S. Political Parties**

Corporate contributions to national political parties are illegal. Contributions to state parties remain legal, but subject to varying limitations and reporting requirements depending on the state. All requests for state and local political contributions are reviewed and approved by the WestRock Government Relations team.

## **Direct Corporate Contributions**

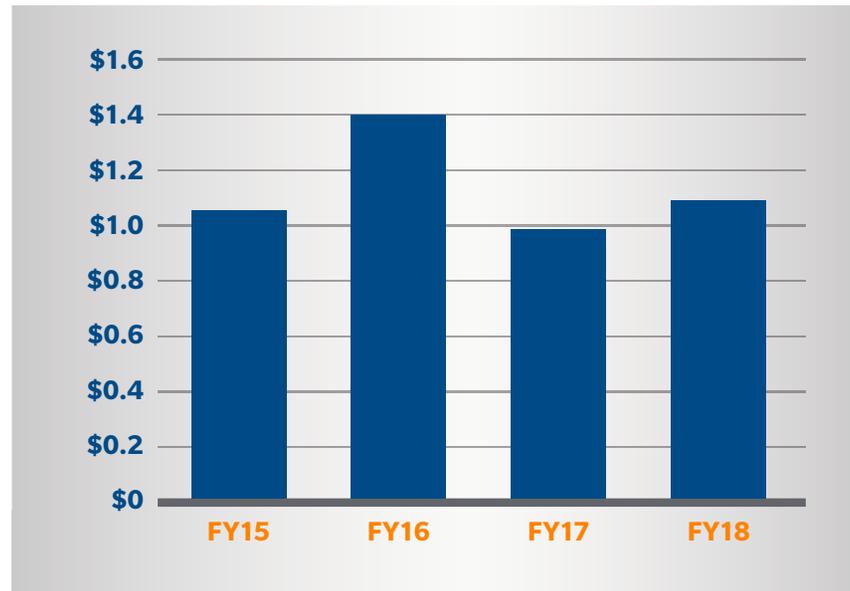
WestRock uses corporate resources to support our position on important public policy issues. Individual state and local laws govern contributions to candidates running for election to state and local offices. The Government Relations department sets an annual budget and has a stringent process for the justification, approval and reporting of any corporate political contributions made in the U.S., where such contributions are permissible by law.

## **Oversight of PAC Political Activity and Spending Practices**

WestRock's political activity and spending practices are overseen and approved by the PAC Advisory Board. The company's political spending includes donations to candidates for elected office, as well as payments to trade associations and tax-exempt organizations that may be used for political purposes.

415-1: Political contributions

Figure 20. Political Contributions  
(Millions)



416 Customer Health and Safety

Management Approach

WestRock manufactures packaging products following procedures that are designed to ensure they meet requirements for the intended uses and markets, whether those uses are packaging for food, pharmaceuticals, cosmetics or other products distributed in domestic or international markets. We partner with our suppliers to select raw materials that meet the requirements of a broad range of U.S. and international regulations. Our suppliers provide certification that products purchased by WestRock meet these standards. We use good manufacturing practices to ensure our final products are consistently produced and are controlled to applicable quality standards. All WestRock’s containerboard mills are certified to ISO 9000.

Our final product testing protocol verifies the effectiveness of our good manufacturing practices and operating procedures in ensuring that the final products meet the requirements for their intended use. The protocol goes beyond industry standards and includes compounds that are relevant to WestRock products and markets.

**416-1: Assessment of the Health and Safety Impacts of Product and Service Categories**

WestRock engages in ongoing assessments of the life cycle of our products as part of our product stewardship review and innovation processes. We conducted 38 product life cycle analyses during FY17 and FY18.

## **419 Socioeconomic Compliance**

### **Management Approach**

WestRock is committed to operating our business with the highest standards of ethics and integrity and in compliance with the laws applicable to our operations. See our disclosure to 102-16.

**419-1: Non-Compliance with Laws And Regulations in the Social and Economic Area**

No material fines were paid during FY17 or FY18 (October 1, 2016 – September 30, 2018) for non-compliance with laws and regulations in the social or economic areas, including laws or regulations related to accounting and tax fraud, corruption, bribery, competition, the provision of products and services, or labor issues, such as workplace discrimination.

## **Data Measurement**

WestRock data included in this report was gathered by facility personnel, financial services teams, human resources and other subject-matter experts. Our boundary is WestRock's global operations as of the close of FY18 (September 30, 2018). For some environmental data, our boundary is WestRock's mills (noted in charts or text) instead of our global operations, since they are our most energy and water intensive operations. Our FY18 data includes all recent acquisitions. These acquisitions have also been added to our baseline year of FY15 in order to accurately track progress on our goals.

In most cases, the data gathered in this report has been extracted from corporate data management systems. Portions of the data come directly from subject-matter experts, and fiber and recycling data comes directly from weight tickets using scales at our operating facilities. Calculation methods have been established using a combination of international, governmental, industry and company standards or protocols. GHG data is calculated using the World Resources Institute (WRI) GHG Protocol and includes stationary sources only.

Reasonable efforts were made to ensure the data presented is accurate and complete. All data has been reviewed and validated by WestRock's Internal Audit team.

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