

SMURFIT WESTROCK
CODE OF ETHICAL CONDUCT
FOR DIRECTORS AND SENIOR FINANCIAL OFFICERS

In addition to the Smurfit Westrock Code of Conduct, to which all employees, officers and Directors are required to adhere, Smurfit Westrock plc (“Smurfit Westrock”) has adopted this Code of Ethical Conduct (“Code”) for its Directors and for its Senior Financial Officers, that is, its principal executive officer (“CEO”), its principal financial officer, and its principal accounting officer, as well as any other senior executive or senior financial officers who may be specifically designated from time to time by the CEO.

Directors and Senior Financial Officers must:

- Act honestly and ethically.
- Perform responsibilities with a view to promoting full, fair and accurate disclosure by Smurfit Westrock in the reports and documents that it files with, or submits to, the U.S. Securities and Exchange Commission (the “SEC”) and in other public communications made by Smurfit Westrock.
- Comply with all applicable laws, rules and regulations, including insider trading laws, in connection with all actions taken by them on behalf of Smurfit Westrock.
- Handle ethically any actual or apparent conflicts between their private interests and the interests of Smurfit Westrock.
- Not compete with Smurfit Westrock, directly or indirectly, for business opportunities. If Smurfit Westrock’s disinterested directors determine that Smurfit WestRock will not pursue a particular opportunity that relates to its business, a director may then do so if authorized by the Smurfit Westrock Board of Directors or a designated committee thereof.
- Disclose to Smurfit Westrock’s General Counsel or Company Secretary any material transaction or relationship that could reasonably be expected to be or to give rise to a conflict of interest. If the General Counsel or Company Secretary, as applicable, determines a conflict of interest exists or could arise from a transaction or relationship, the matter will be submitted to the Smurfit Westrock Board of Directors in accordance with the Board’s approved policies and procedures.
- Not directly or indirectly falsify or cause to be falsified any book, record or account that reflects the transactions and dispositions of Smurfit Westrock’s assets.
- With respect to Senior Financial Officers, (i) not take any direct or indirect action to coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of Smurfit Westrock’s financial statements that are required to be filed with the SEC, and, (ii) with respect to such an accountant, not make, or cause to be made a materially false or misleading statement and not omit to state, or cause the omission to state, any material fact necessary in order to make statements made not misleading in light of the circumstances under which they were made.
- Maintain the confidentiality of information regarding Smurfit Westrock acquired in the course of employment, or in his or her capacity as a director, as applicable, except when disclosure

is authorized by the CEO or any other appropriate officer or is required by laws or regulations, provided that the foregoing obligation does not prohibit current or former Directors or Senior Financial Officers from voluntarily communicating with the SEC or other appropriate authorities regarding possible violations of law.

- Promptly report any violation of this Code to Smurfit Westrock's General Counsel, unless the General Counsel is involved in the matter, in which case, the violation should be reported to the Smurfit Westrock Board of Directors.

Smurfit Westrock shall not, directly or indirectly, extend or maintain credit, or arrange for the extension of credit, or renew an extension of credit, in the form of a personal loan or guarantee to or for any Director other than legally permissible expense advancements.

If Smurfit Westrock's disinterested directors determine that Smurfit WestRock will not pursue a particular opportunity that relates to its business, a director may then do so if authorized by the Smurfit Westrock Board of Directors or a designated committee thereof.

Directors and Senior Financial Officers must sign and submit to the General Counsel an acknowledgement that they have received, read and understand this Code, and that they are subject to and will comply with its provisions.

All Directors and Senior Financial Officers are expected to adhere at all times to this Code.

Failure to comply with this Code is a serious offense and will result in appropriate action.

Smurfit Westrock shall promptly disclose, to the extent and in the manner required by any applicable law, SEC rule, or New York Stock Exchange listing standard, the nature of any amendment to this Code (other than technical, administrative, or other non-substantive amendments), the approval of any waiver of or material departure from a provision of this Code, and any failure to take action within a reasonable period of time regarding any waiver of or material departure from a provision of this Code that has been made known to a Senior Financial Officer or Director. The Smurfit Westrock Board of Directors, or a designated committee thereof, has authority to review and either approve, or recommend to the Board for approval, as applicable, any waiver of or material departure from a provision of this Code.

This Code shall be periodically reviewed by the Smurfit WestRock Board of Directors, or a designated committee thereof.