

WestRock Supplier Principles of Conduct

March 2024

WestRock is committed to conducting business in a sustainable, ethical, legal and socially responsible manner in accordance with its values of integrity, respect, accountability and excellence as provided in its [Code of Conduct](#). WestRock expects its Suppliers to share this same commitment and, as a condition of doing business, requires its suppliers to follow the principles of conduct set out below (“Principles”). Suppliers must take reasonable measures to ensure that any suppliers from which they source act in accordance with these Principles.

These Principles do not replace or alter contract requirements; however, they may supplement them. If a contractual term is stricter than these Principles, a supplier must meet the stricter requirements.

APPLICATION

These Principles apply to all WestRock’s suppliers (Suppliers) worldwide. WestRock requires its suppliers and their employees, contractors, sub-contractors, vendors, agents, representatives, affiliated entities and anyone acting on behalf of a supplier (collectively, “Representatives”) to comply with these Principles. When used in this document, the word “Supplier” shall automatically include its “Representatives. WestRock expects all its suppliers to communicate these Principles appropriately to their Representatives and others in its supply chain and have adequate policies and procedures to ensure that these Principles are adhered to by itself and its Representatives.

The Principles are as follows:

COMPLIANCE WITH LAWS

Compliance with all laws is a minimum expectation: Suppliers must operate their businesses in full compliance with all applicable laws, codes, rules and regulations of the countries, provinces, states, regions and municipalities in which they operate, as well as all applicable international conventions and standards, including the United Nations 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, whichever affords the greater level of protection.

ANTI-CORRUPTION AND ANTI-TRUST

Compliance: Suppliers must abide by all applicable anti-corruption, anti-bribery and anti-trust laws and regulations. WestRock requires its suppliers to have clear internal policies or guidance documents and adequate procedures regarding compliance with these laws and regulations, and the ability to demonstrate that they have communicated them to Representatives to ensure compliance.

Business Practices: Suppliers must conduct their businesses and operations at all times with the highest standards of integrity, fairness, ethics and sustainability. Suppliers shall not engage in bribery, kickbacks, collusive bidding, price fixing, extortion, embezzlement or other unfair trade practices and must pursue a zero-tolerance policy on all violations of the same.

Conflicts of Interest: Any ownership or beneficial interest in a supplier’s business by a government official, representative of a political party or a WestRock worker must be declared to WestRock prior to any business relationship with WestRock.

HUMAN RIGHTS AND LABOR

Discrimination is not Permitted: WestRock’s suppliers shall be committed to a workplace free of harassment, bullying, discrimination and unfair or unacceptable treatment of all forms. Suppliers must always treat everyone fairly, with dignity and respect and provide equal employment opportunities and treatment, regardless of worker or job applicant characteristics, including but not limited to race, national origin, religion, age, disability, gender identity or expression, marital or maternity status, sexual orientation, union membership or political affiliation. Suppliers should value and respect diversity and inclusion and are encouraged to demonstrate a commitment to building and maintaining a diverse workforce.

Compensation, Working Hours and Overtime: WestRock’s suppliers shall compensate employees in compliance with all applicable laws and regulations and international standards relating to minimum wages, overtime, piece work, employee benefits, maximum hours worked per day or days worked per week. Suppliers shall ensure that work schedules and overtime are consistent with all applicable laws and collective bargaining agreements, whichever affords the greater level of protection, including maximum hour and rest period laws. Workers shall receive leave and public holidays in accordance with applicable law.

Fair Treatment of Employees: Suppliers must uphold the effective prohibition of child labor and discrimination and uphold the principles of fair wages, fair working hours, freedom of association and protection of the health and safety of their employees. Suppliers must not:

- engage in child labor and must comply with all applicable laws and international standards relating to the employment of underage workers;
- allow unsafe or immoral work practices, forced labor or slavery;
- allow any form of discrimination or harassment;
- disregard occupational health and safety obligations, including, but not limited to:
 - insufficient standards
 - absence of protective measures
 - inadequate training or instruction
- disregard freedom of association, including:
 - formation and joining of trade unions
 - discrimination or unfair treatment related to trade unions
 - free operation of trade unions (inc. industrial actions)
 - withholding an adequate living wage
- allow unlawful eviction or seizure of territory from which a person gains their livelihood;
- hire or use private or public security forces which undermine any human rights; or
- allow acts or omissions that would otherwise impair the fulfilment of their human rights obligations.

WestRock's suppliers must have in place procedures to allow any employee or third party to report violations of any of these Principles. Violations of these Principles shall also be reported to WestRock via [WestRock Supplier Compliance Violation Form](#).

Social Responsibility: WestRock's suppliers must carry out human rights due diligence to identify, prevent, mitigate, and account for how they address and manage potential adverse impacts on human rights that they may cause or contribute to through their own activities, or which may be directly linked to their operations, products, or services through their business relationships.

SEDEX: Suppliers are requested to join SEDEX (The Supplier Ethical Data Exchange). Westrock encourages its suppliers to align their sustainability policies and targets with the relevant UN Sustainable Development Goals.

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

Communities: WestRock strives to foster good relationships with the local communities in which it operates and expects its suppliers to do the same.

PRIVACY AND DATA PROTECTION

Privacy: Suppliers must comply at all times with all applicable data protection and privacy laws and regulations concerning the collection, use, processing and protection of data including personal information and ensure compliance with such laws and regulations by its Representatives. Suppliers must take appropriate steps to safeguard confidentiality and privacy of all data and personal information of individuals.

CONFIDENTIALITY

Proprietary Information: WestRock's suppliers shall observe all applicable confidentiality obligations relating to the confidential or proprietary information of themselves and all third parties. Suppliers shall respect the rights of ownership of proprietary business information and intellectual property rights and protect their confidentiality at all times.

ENVIRONMENT

Environmental Requirements: Suppliers shall meet or exceed the requirements of all applicable environmental laws, codes and regulations and conduct their business in a manner consistent with the principles set forth in [WestRock's Environmental Policy](#)

Environmental Management: Suppliers must have an environmental management system in place to ensure compliance with all Environmental Requirements and to continually improve their environmental performance when feasible. This includes, without limitation, a program, where practicable, for measuring, reporting, and reducing air emissions, water intake, wastewater discharges, soil contamination, consumption of raw materials and natural resources, energy consumption and efficiency, energy release, generation of waste, land usage, biodiversity, treatment and discharge of industrial wastewater, dealing with wastes and hazardous substances, reducing consumption of raw materials and natural resources.

Environmental Sustainability: WestRock has established the following environmental sustainability targets, and we expect our suppliers to partner with us to: (1) reduce our Scope 3 greenhouse gas (GHG) emissions by 27.5% from a 2019 baseline by 2030, (2) reduce our water intake in key watersheds, (3) conserve working forests, and (4) protect biodiversity.

Natural and Human Resources: WestRock expects its suppliers to use natural resources wisely and responsibly while respecting the rights of Indigenous people within their natural resource supply chains.

QUALITY

Country of Origin: Suppliers must only use materials derived from operations that are in compliance with the applicable laws and regulations of the country of origin.

Commitment to Quality and Service: Suppliers shall ensure that all materials, products and services supplied to WestRock meet WestRock's quality and service requirements.

PRODUCT STEWARDSHIP

Traceability: WestRock values supply chain transparency. At our request and at no additional charge, suppliers will provide such documentation and data as WestRock may reasonably request to verify the chemical composition of all materials, ingredients, and products provided to WestRock, including where necessary a Continuing Product Guarantee. Suppliers will notify WestRock prior to any compositional change of any products supplied to WestRock.

Restricted Substances: Suppliers shall implement such policies and procedures as may be required to ensure that any materials, ingredients or products provided to WestRock do not contain restricted (limits established by product or material) and/or prohibited ingredients identified by WestRock ("Restricted Materials"). In particular, suppliers shall not provide any "3TG" metals (tin, tantalum, tungsten or gold) that were sourced, in entirety or in part, from the Democratic Republic of Congo, Angola, Burundi, Central African Republic, Congo Republic, Rwanda, South Sudan, Tanzania, Uganda or Zambia.

Continuous Improvement: WestRock expects its suppliers to collaborate with it to reduce, eliminate or manage chemicals identified by WestRock as Restricted Materials and to proactively look for opportunities to provide WestRock with safer and more sustainable alternatives to existing materials, ingredients and products.

IMPLEMENTATION AND ENFORCEMENT

Acceptance of Principles: These Principles are an important part of WestRock's supplier selection and evaluation process. Suppliers may be required to sign an acknowledgement each year to confirm their understanding and acceptance of these Principles.

Demonstration of Compliance: WestRock's suppliers must be able to demonstrate compliance with these Principles at the request and to the satisfaction of WestRock. Suppliers shall allow WestRock or independent third parties acting on its behalf to audit suppliers' compliance with these Principles. These assessments generally include confidential interviews with on-site workers. If a supplier fails to uphold any aspect of the Principles, the supplier is expected to implement corrective actions. Notwithstanding anything to the contrary in any contractual document between the Supplier and WestRock, WestRock may terminate any agreement with any supplier that cannot demonstrate that it is upholding these Principles.

Notice of Violations: Any person with any knowledge of violation of these Principles should contact WestRock using the following link. Access to the form can also be found at westrock.com under 'Supplier Resources'.

[WestRock Supplier Compliance Violation Form](#)

FOR MORE INFORMATION:

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