



<b>POLICY NAME:</b>	<b><i>US EQUAL EMPLOYMENT OPPORTUNITY POLICY</i></b>
<b>DEPT/GROUP:</b>	<b><i>HUMAN RESOURCES</i></b>
<b>POLICY SCOPE:</b>	<b><i>U.S. EMPLOYEES</i></b>
<b>POLICY REGION:</b>	<b><i>UNITED STATES</i></b>
<b>EFFECTIVE/REVISED DATE:</b>	<b><i>JULY 1, 2018</i></b>
<b>OWNER:</b>	<b><i>CHIEF HUMAN RESOURCES OFFICER</i></b>

### **Purpose**

WestRock is an Equal Opportunity Employer and maintains a work environment in which all employees are treated with respect. This Policy supplements [WestRock's Global Mutual Respect Policy](#) and addresses specific requirements of the U.S. government with respect to equal employment opportunity and affirmative action.

### **Equal Opportunity and Affirmative Action**

It is WestRock's policy not to discriminate against any employee or applicant for employment because of race, color, religion or creed, sex (including pregnancy), sexual orientation, gender identity, national origin or ancestry, age, genetic information, physical or mental disability or because he or she is a protected veteran. We take affirmative action to employ and to advance in employment all persons regardless of race, color, religion or creed, sex (including pregnancy), sexual orientation, gender identity, national origin or ancestry, age, genetic information, physical or mental disability or because he or she is a protected veteran, and to base all employment decisions on valid job requirements. This policy applies to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation and selection for training, including apprenticeships and internships, at all levels of employment.

We have written affirmative action plans maintained at local facilities setting forth the policies, practices and procedures that WestRock, and its United States subsidiaries and affiliates, have implemented to ensure that WestRock's commitment to non-discrimination and affirmative action is accomplished. Non-confidential portions of these affirmative action programs are available in the human resources department for inspection by any employee or applicant during normal business hours.



### **Anti-Harassment Commitment**

Employees and applicants of WestRock will not be subject to harassment based on race, color, religion or creed, sex (including pregnancy), sexual orientation, gender identity, national origin or ancestry, age, genetic information, physical or mental disability or because he or she is a protected veteran. WestRock's commitment to a harassment-free workplace is reflected in WestRock's Global Mutual Respect Policy.

### **Complaint and Investigation Procedures and Employee Obligations**

This policy shall be posted in all Company facilities.

All WestRock managers are responsible for abiding by this Policy. Managers should ensure that employment practices and personnel actions in all jobs are based on valid job requirements and administered without regard to race, color, religion or creed, sex (including pregnancy), sexual orientation, gender identity, national origin or ancestry, age, genetic information, physical or mental disability or because he or she is a protected veteran. Managers are also expected to ensure that qualified minorities, females, protected veterans, and individuals with disabilities are introduced into the workforce, and that those employees are encouraged to seek promotion and are considered as opportunities arise. All managers who receive a complaint of or otherwise observe or become aware of any potential discrimination, harassment or retaliation must promptly report that complaint or incident to Human Resources or to the Legal Department for appropriate handling. Failure to report complaints or misconduct could lead to disciplinary action, up to and including termination of employment.

Every WestRock employee has an obligation to ensure compliance with this policy and to the establishment and maintenance of a workplace free from discrimination and harassment. If you believe you have been subjected to discrimination, you must report the matter to your manager, a Human Resources representative or the Compliance Line. The Company will conduct an appropriate investigation and take whatever action is warranted. Investigations will be conducted in as confidential a manner as is compatible with a thorough investigation of the complaint. For further information, please consult WestRock's Global Mutual Respect Policy.

Violations of this policy can result in discipline up to and including termination.

### **Anti-Retaliation Commitment**

Retaliation, including threats or coercion because an employee or applicant has objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation or hearing or has otherwise sought to obtain legal rights under any federal, state or local EEO law is prohibited. Retaliation can include harassment, threats, intimidation, coercion or discrimination. Similarly, efforts to generate hostility in the workplace against persons involved



in an investigation under this policy are prohibited. For further information, please consult WestRock's Global Mutual Respect Policy.

**Responsibility for Implementation – Statement from Steve Voorhees, Chief Executive Officer**

As Chief Executive Officer of WestRock Company, I am committed to the principles of Affirmative Action and Equal Employment Opportunity set forth in this Policy. To ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have designated the Chief Human Resource Officer as the officer in charge of overseeing the administration of this policy and establishing and maintaining internal audit and reporting systems to allow for effective measurement of WestRock's programs.

---

Steve Voorhees, Chief Executive Officer