



## Equal Employment Opportunity Policy

**Scope:** U.S. Employees

**Effective Date:** July 1, 2015

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Our commitment to achieve leadership positions in each of our markets around the world requires a strong, highly professional, innovative and diverse organization. Meeting this commitment means attracting, developing and retaining highly talented individuals. Equal employment opportunity is a key policy in WestRock's effort to build on the strengths and contributions of a diverse workforce and is a critical part of our core values. Furthermore, our success depends on leveraging the diversity of our employees, whose differences and shared values foster innovation and positive change.

WestRock is committed to equal employment opportunity and compliance with all applicable employment laws. It is WestRock policy that employees and applicants otherwise eligible for employment will be evaluated on the basis of their individual merit and qualifications for the work to be performed. Any employment decision or practice that unlawfully discriminates because of age, race, sex (including pregnancy), gender, color, national origin, religion, sexual orientation, gender identity, status as a protected veteran, status as a qualified individual with a disability, or other status protected by law, is strictly prohibited. WestRock policy applies to all aspects of employment with the company including recruitment, hiring, training, transfer, promotion and separation. Harassment is one form of discrimination prohibited by this policy and is the subject of a separate WestRock policy statement. All employees are expected to comply with these policies.

Managers should ensure that employment practices and personnel actions in all job titles are based on valid job requirements and administered without regard to age, race, sex (including pregnancy), gender, color, national origin, religion, sexual orientation, gender identity, protected veteran status, status as a qualified individual with a disability, or other status protected by law. 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.

If you believe you have been subjected to discrimination, you must report the matter to your manager, a human resources representative or the Compliance and Ethics 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.

Violations of this policy can result in disciplinary action up to and including discharge. Retaliation against anyone who has filed a good faith complaint, or has assisted or participated in an investigation, is forbidden. 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. Knowingly filing a false or bad faith complaint, failing to cooperate, or knowingly giving a false statement in an investigation can be grounds for discipline up to and including discharge.

The Company expects that all management personnel clearly understand and follow this Equal Employment Opportunity Policy. We ask that all employees support our equal employment opportunity objectives.