



WestRock Principles of Conduct

WestRock is committed to conducting business in an ethical, legal and socially responsible manner. WestRock expects its Suppliers to share this same commitment and, as a condition of doing business, requires its Suppliers to follow these Principles of Conduct ("Principles"). Suppliers must take reasonable measures to ensure that any suppliers from which they source act in accordance with these Principles.

Compliance with Laws is Required: WestRock 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.

Child Labor is not Permitted: WestRock will not tolerate the exploitation or use of children as workers by Suppliers. WestRock shall not contract with any Supplier that employs individuals younger than 15 years of age or the legal minimum age, if higher.

Forced, Prison or Involuntary Labor is not Permitted: WestRock will not tolerate the use by Suppliers of forced labor in any form, including slave, prison, indentured or bonded labor.

Discrimination is not Permitted: WestRock will not tolerate discrimination by Suppliers of their workers on the basis of race, color, religion, gender, social and ethnic origin, age, marital status, pregnancy, creed or political belief, disability, sexual orientation or any other basis prohibited by law.

Harassment is not Permitted: WestRock expects its Suppliers to provide a work environment that is free from any form of harassment, including verbal, physical, or sexual harassment. Threats or acts of retaliation or physical punishment against workers will not be tolerated. At all times, workers shall be treated with respect and dignity.

No Undocumented Workers: Suppliers shall only utilize workers who have a legal right to work.

Compensation (Wages and Benefits): WestRock requires that Suppliers compensate employees in compliance with all laws and regulations relating to minimum wages, overtime, piece work, employee benefits, maximum hours worked per day or maximum days worked per week.

Freedom of Association: Suppliers shall recognize and respect the right of workers to associate freely or organize as permitted by applicable laws and regulations and to be free to raise concerns related to employment issues.

Product Quality and Product Safety: All products that Supplier manufactures on behalf of or sells to WestRock shall be designed and produced to be safe for their intended uses, and for other reasonably foreseeable uses. WestRock is committed to providing products that meet applicable regulatory specifications and quality standards.

Sustainability of Resources: Suppliers must only use materials derived from operations that are in compliance with the environmental and social laws and regulations of the country of origin.

Environment: Suppliers shall meet or exceed all environmental standards required by applicable laws, codes and regulations.

Conflict Minerals: Suppliers shall disclose if they are providing to WestRock any "3TG" metals (tin, tantalum, tungsten or gold) that were sourced from the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Congo Republic, Rwanda, South Sudan, Tanzania, Uganda, or Zambia.

Workplace Safety and Health: Suppliers shall keep the work environment free from recognized hazards and assure compliance with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical and structural safety.

Security: WestRock strongly encourages its Suppliers to implement security controls to secure their international supply chain to comply with anti-terrorism laws in the countries and regions of the world in which they operate and transact business. WestRock has specifically partnered with U.S. Customs and Border Protection (CBP) to secure WestRock international supply chain and so requires all Suppliers of U.S.-bound products to demonstrate that they are meeting Customs-Trade Partnership Against Terrorism (C-TPAT) security criteria, as published by CBP.

Business Practices: Suppliers shall not engage in bribery, kickbacks, collusive bidding, price fixing or other unfair trade practices.

Demonstration of Compliance: Supplier must be able to demonstrate compliance with these Principles at the request and to the satisfaction of WestRock. These minimum requirements are part of all agreements between WestRock and applicable Suppliers. We expect our Suppliers to develop and implement appropriate internal business processes to ensure compliance with these Principles. WestRock routinely utilizes independent third-parties to assess 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. WestRock reserves the right to terminate an agreement with any Supplier that cannot demonstrate that it is upholding the Principles.

Notice of Violations: Any worker with any knowledge of violation of these Principles should contact WestRock at:
<https://www.westrock.com/en/supplier-resources/supplier-compliance-violation-form>