



Anti-Human Trafficking and Slavery Statement

WestRock wholly supports the elimination of human trafficking and slavery from the supply chain and the transparency of our efforts in this regard are consistent with the requirements of the California Transparency in Supply Chains Act of 2010 and the United Kingdom's Modern Slavery Act of 2015. We do not tolerate human trafficking, both in the U.S. and globally, including the procurement of commercial sex acts, the use of forced labor and all related conduct. WestRock expressly prohibits the use of forced labor, including indentured labor, slave labor and any form of human trafficking.

Verification of Supply Chain and Evaluation of Risk

We believe that the nature of our business and the environment in which we operate mitigate the risk of human trafficking and slavery taking place within our business and our supply chain. We require most prospective contract suppliers to complete a due diligence process during which we: (1) collect information from the supplier; (2) review the supplier's reputation and background; and (3) complete a risk-based assessment of both the location of the supplier and the proposed scope of work. WestRock also conducts third party Corporate Social Responsibility Audits of suppliers in identified high risk areas or where the services provided may carry a high degree of social responsibility risk. These independent, announced audits conform to the SMETA four pillars: health & safety, business ethics, labor and the environment. The audit protocol also incorporates our Principles of Conduct for Suppliers, with a review of the use by Suppliers of forced labor in any form, including slave, prison, indentured or bonded labor.

Required Compliance with Law

In general, WestRock's suppliers are contractually required to comply with applicable laws and regulations in the U.S. and globally in providing us goods, products and services and are required to contractually confirm the prohibition of forced labor in any form, including slave, prison, indentured or bonded labor. WestRock's Supplier Risk Management Program also requires key suppliers to confirm they have read and understand WestRock's Principles of Conduct for Suppliers. Specifically, WestRock requires its suppliers to comply with all applicable laws, legal requirements and regulations of the country in which the supplier does business. This program is focused on suppliers managed by the corporate procurement team and will be developed to cover other areas with procurement responsibility across the organization. WestRock's supplier review process is designed to identify and mitigate risk and is to be used proactively when engaging suppliers. WestRock's Principles of Conduct for Suppliers is



available to view through both the Company's internal and external websites. Suppliers that fail to adhere to these requirements are subject to sanctions, including, but not limited to, termination of their agreements by WestRock.

Maintenance of Ethics and Compliance Program and Accountability

WestRock maintains a broad-based corporate ethics and compliance program that addresses values, leadership, training, audits, certifications, and accountability and is intended to ensure compliance with applicable laws and a culture committed to ethics and integrity in all we do. In keeping with this commitment, WestRock maintains robust, global supply chain programs, practices, and procedures to support the goal of ensuring that our suppliers meet our ethical standards and comply with applicable laws and regulations, including those prohibiting human trafficking and forced labor. WestRock also has a global Mutual Respect policy prohibiting forced and child labor as well as human trafficking. In addition, our employees are responsible for complying with our internal controls that seek to combat human trafficking and forced labor. WestRock employees found to be in violation of the global Mutual Respect policy or other WestRock guidelines or procedures are subject to discipline, up to and including termination.

Training of Relevant Employees

While WestRock does not offer formal and specific training on human trafficking and forced labor to our employees, it does provide training on the global Mutual Respect policy and requires employees to review the policy. All employees, including those who have direct contact with our suppliers, are required to review and comply with Company policies including the Code of Conduct and the global Mutual Respect Policy.

Reporting Violations and/or Concerns

We expect and encourage our employees to raise any concerns regarding violations of law, regulations or our standards of business conduct by using one of several reporting channels we offer, including reporting to local management, Human Resources, the Legal Department, or the 24-hour WestRock Compliance Line. Reports can be made without fear of retaliation, which we do not tolerate.