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| POLICY NAME: | <i>GLOBAL HEALTH AND SAFETY PROGRAM POLICY</i> |
| DEPT/GROUP: | <i>HEALTH AND SAFETY</i> |
| POLICY SCOPE: | <i>ALL TEAMMATES</i> |
| POLICY REGION: | <i>GLOBAL</i> |
| DATE: | <i>JANUARY 1, 2022</i> |
| OWNER: | <i>ALLISON MONTGOMERY</i> |

I. Safety Excellence System

The Safety Excellence System (SES) provides the framework for health and safety management and defines our commitment to the safety of our team members, regulatory compliance, and continuous improvement. The Safety Excellence System is reviewed annually. The WestRock Center of Excellence for Health and Safety maintains [pages](#) on the WestRock intranet for communicating with team members about safety matters. These pages include corporate policies, standards and implementation tools associated with the SES, corporate safety data and contact information for health and safety department members.

II. Safety Leadership

WestRock company leaders demonstrate their commitment to health and safety by fostering a positive safety culture, assigning adequate resources and through the alignment of health and safety strategy with business strategy. Leaders are responsible for supporting the implementation of the SES and related health and safety initiatives.

III. Goals and Annual Planning

Periodically the Corporate Health and Safety Department, under the direction of the Vice President, Health and Safety, prepares a WestRock Health and Safety (multiyear) Strategy. The strategy is reviewed and approved by the Health and Safety Council, the CEO and/or the WestRock Steering Team.

The Corporate Health and Safety Department establishes enterprise-wide health and safety goals and objectives that are aligned with and integrated into the Health and Safety Strategy. In turn each WestRock business segment prepares a business health and safety plan that is consistent with the enterprise-wide goals and objectives and tailored to the specific needs of the business. Each WestRock site establishes a site health and safety plan, consisting of targets and actions that are consistent with the business segment health and safety plan and tailored to the site's specific needs and management objectives.

IV. Health and Safety Resources

The Vice President, Health and Safety is responsible for regular review and communication of safety organizational roles and responsibilities with all levels of management, including during

regularly scheduled site, division or business unit meetings, or as part of the annual health and safety planning process. Every WestRock site where team members (including temporary and contract team members) are present, at a minimum has an internal team member located at the site assigned as the site safety coordinator who is responsible for coordinating safety management activities for that site. The designated site safety coordinator reports to the site general manager, plant manager, or equivalent. An adequate amount of Full Time Equivalents (FTEs) must be assigned to the safety coordinator role. Guidance is provided to sites for headcount allocation purposes. Adequate resourcing enables the site to effectively implement Safety Excellence programs, to deliver safety training programs and to sustain regulatory compliance.

V. Safety Performance Accountability

Health and safety performance is integrated into performance management and variable compensation systems at an appropriate level of management and includes an assessment of accountability and performance against health and safety goals and objectives in accordance with site and business health and safety plans and/or WestRock health and safety strategy.

VI. Team Member Engagement

Each WestRock facility provides team members at all levels within the organization with a meaningful opportunity to participate in health and safety activities. Team members are strongly encouraged to participate in operational learning events, Culture of Caring activities, safety committees, pillar teams, procedural development and review.

Each WestRock manufacturing site establishes a site safety team or safety pillar team. The safety teams follow a written standard agenda for their meetings. The site safety teams drive implementation and continual improvement of the SES, develop the annual site health and safety plan with related key performance indicators and perform annual self-assessments. Site safety teams identify and sponsor continuous improvement projects for site safety with the intent to improve culture and safe work conditions.

VII. Site Health & Safety Program

Each site develops and implements a site-specific safety excellence program. At a minimum, each safety excellence program includes the following elements:

- Programs and procedures as specified by the SES Site Safety Management Standards;
- Programs and procedures as specified by the SES Technical Performance Standards;
- Performance indicators to measure health and safety program progress.

The team tasked with performing this review includes at least one team member representative and one representative of management and can be performed by the site's safety team or safety pillar team. The review of the SES program shall include a variety of stakeholders to ensure diverse perspectives.

VIII. Site Self-Assessment

Each WestRock site completes, at least once every twelve (12) months, both:

- Regulatory compliance self-assessment and
- SES standards self-assessment.

This is done to verify and ensure that all sites continue to operate under the minimum regulatory mandates as well as those requirements as set forth under the WestRock SES standards. A common system, Benchmark Gensuite System (BGS), is used to track and conduct these assessments and associated corrective actions.

IX. Safety (Risk) Assessment

WestRock sites conduct safety (risk) assessments where hazards are proactively identified and addressed to prevent injuries and illnesses. For each identified category of risk, sites consider the current controls and safeguards, layers of defenses, and the effectiveness of controls. Where controls are deemed to be inadequate, sites develop a plan for implementing mitigation measures following the standard hierarchy of controls – elimination, substitution, engineering controls, warnings, administrative controls, and personal protective equipment. In addition, each WestRock site implements a process to ensure the management observation and review of high-risk tasks.

X. Incident Reporting

All WestRock sites are required to report safety related incidents and events through the WestRock Benchmark Gensuite System (BGS). Reporting within the BGS is required regardless of international, provincial, state or local regulatory requirements. Some examples of safety related incidents and events are:

- Any work-related injury or illness
- Near Miss (PLCE)
- Stop Work Authority Used
- Property Damage
- Fires
- OEL Exceedance (IH)
- Vehicle incidents
- Spills/release
- Regulatory Inspections
- Notices of Noncompliance (NON)
- Requests For Information (RFI).

All WestRock sites investigate the following three (3) types (at a minimum) of health and safety incidents:

- Life Changing Events (LCE)
- Potential Life Changing Events (PLCE)
- Recordable Injury Incidents

All reports and corresponding preventive actions from investigations and operational learning events are maintained in the BGS. Actions are additionally captured in the BGS and tracked to closure. After-event communications are used to share operational and safety improvements and preventive actions identified as a result of the safety related incident or event.

XI. Site Health & Safety Training

WestRock strives for a future-ready, skilled, and certified workforce. To achieve this vision, health and safety training is provided to all team members appropriate to their duties and responsibilities. The overall scope of health and safety training includes:

- Applicable regulatory required training and certifications
- Training requirements as identified in the SES site standards.
- Job and task-specific training

XII. Site Safety Communications

All Westrock sites ensure effective and timely communication of relevant health and safety related information to affected internal and external stakeholders. All WestRock sites implement processes for communicating the following types of safety information to team members at a site:

- Concern reports
- Safety event related preventive actions
- Health and Safety Performance indicators
- Health and Safety strategy and actions plan progress
- Health and Safety best practices

Internal communications and communications containing proprietary information to an outside party require prior review and approval from Corporate Legal, Corporate Communications and/or Corporate Health and Safety Departments. The site General Manager or equivalent position reviews and, as necessary, signs such documents, except in such cases where the WestRock Legal Authority Matrix would require the signature of an officer or other corporate representatives.

XIII. Management of Change

All WestRock sites develop, document, and implement a management of change program. This management of change program is used to evaluate the impacts of temporary and permanent changes in the workplace before they occur, including, but not limited to: (a) changes in the workforce, (b) new or discontinued operations or sites, (c) new or modified equipment, (d) new or modified manufacturing processes, (e) use of new chemicals or substantial changes in existing chemistry, (f) the occurrence of injuries or illnesses, and (g) internal safety audit and inspection results.

XIV. Documents and Records

WestRock's Corporate Health and Safety Department and each WestRock site maintains health and safety related documents, programs, procedures and instructions in a document control system. WestRock's Corporate Health and Safety Department and each WestRock site maintain records relating to the health and safety in accordance with all applicable legal requirements and the directives set forth in WestRock's Legal Record Retention Policy.

XV. Corporate Audits

A formal health and safety audit program is managed by the Corporate Health and Safety Department, Auditing Function and includes a review of the following:

- Compliance with applicable regulatory standards (federal, state/province, local)
- Conformance with and implementation status of the WestRock SES standards
- Onsite procedures and implementation documentation

The Health and Safety Auditing Function develops the annual schedule for health and safety audits. The schedule and frequency between audits is based on site-specific risk criteria, assessments related to site health and safety activities, input from WestRock health and safety department managers, and the results of previous audits.

Audit teams consist of:

- 1) WestRock team members in the Health and Safety Centre of Excellence function,
- 2) Corporate Health and Safety staff,
- 3) internally trained health & safety site staff, and/or
- 4) qualified third-party auditors.

XVI. Due Diligence

When potential acquisitions, mergers, leases or other business transactions are being considered, the corporate health and safety department conducts a health and safety assessment of the target entity as part of the WestRock due diligence effort.

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