



Global Environmental Policy

Our Vision

Smurfit Westrock plc and its subsidiaries ('the Company' or 'Smurfit Westrock') is committed to ensuring that the environment with which we interact is protected today, and into the future, as we strive to efficiently use natural resources and energy, prevent pollution, minimize waste, and promote a circular economy.

Our Guiding Principles

Guided by our values, our Code of Conduct and other Company policies, Smurfit Westrock has established the following principles for operating as good stewards of the human and natural environment with which the Company interacts. We also expect our key suppliers and business partners to act in alignment with these environmental principles.

- **Stewardship.** We aim to use wood fiber, water and other natural resources responsibly. We also will look for opportunities to strategically optimize the environmental performance of our manufacturing operations by reducing greenhouse gas and other air emissions, energy use, water intake, and waste generation and implementing processes to avoid [or mitigate/reduce the impact of] environmental incidents. We strive to use low carbon, circular economy principles to design and manufacture products that meet applicable safety requirements, as well as our customers' needs and expectations relating to environmental sustainability.
- **Compliance.** We are committed to full compliance with environmental laws and regulations that apply to our business and expect our employees, contractors, and suppliers to uphold these same laws and regulations. We will develop required policies for material environmental topics and implement environmental management systems to support compliance. We will also conduct periodic audits to assess conformance with legal and company environmental requirements.
- **Accountability.** Senior management is accountable for supporting the environmental program and ensuring adequate resources are provided for implementation. Line managers have primary responsibility for compliance and are empowered to take actions that ensure we consistently meet our environmental obligations. Every employee is expected to comply with applicable environmental laws and regulations, Company environmental policies (as they are developed) and procedures applicable to their work, and these guiding principles.

- **Communication.** Smurfit Westrock will communicate transparently and publicly about our environmental impacts and results. We will engage with stakeholders on environmental issues and conduct ongoing educational programs for our colleagues to promote awareness and understanding of environmental matters.
- **Continual improvement.** We will consider environmental factors in our business decisions, including the development of new products and investments, and will work to improve our environmental systems and processes. We also will set and measure our progress against targets and objectives for preventing pollution, minimizing or eliminating substances of concern where feasible, and reducing the environmental impacts of our business.

Our Commitment

This Environmental Policy applies to all operations within the Company. Senior management will provide the resources necessary to implement this Policy and conduct an annual review to ensure its ongoing effectiveness. This Policy is communicated to all employees and is available to interested parties through our website www.smurfitwestrock.com