

Slavery and Human Trafficking Statement

FOR THE YEAR ENDED 31 DECEMBER 2025

Smurfit Westrock (“Smurfit Westrock”, the “Company”) is committed to eliminating the risk of forced labor and human trafficking occurring in our direct operations and direct supply chain as set out in the UK Modern Slavery Act 2015 (the “Modern Slavery Act”). This Slavery and Human Trafficking Statement (“Statement”) is made in compliance with the legislation. We will continue to comply with the legislation and to promote a culture and actions that reflect a zero-tolerance approach to modern slavery.

This Statement relates to the financial year ending 31 December 2025 and is made on behalf of Smurfit Westrock plc, Smurfit Westrock UK Limited (our “UK Corrugated, Paper and Recovered Fiber Operation”); Smurfit Westrock Consumer Packaging Limited, Smurfit Westrock Consumer Packaging UK Limited, Smurfit Westrock Bristol Ltd and Smurfit Westrock Consumer Belfast Limited (our “UK Consumer Packaging Operation”), (together our “UK Operations”).

Our Business Operations and Structure

Smurfit Westrock was created in July 2024 as a strategic combination between Smurfit Kappa Group plc (“Smurfit Kappa”), one of the leading integrated corrugated packaging manufacturers in Europe, with a large-scale pan-regional presence in Latin America, and WestRock Company (“WestRock”), one of the leaders in North America in corrugated and consumer packaging solutions and a multinational provider of sustainable fiber-based paper and packaging solutions.

Throughout this Statement, references may be made to the legacy companies, Smurfit Kappa and WestRock, and actions they undertook prior to the formation of Smurfit Westrock.

We are a global leader in sustainable paper-based packaging with extensive scale, quality products and geographic reach and diversity. We aim to be the ‘go-to’ packaging partner of choice, bringing together highly complementary portfolios and sets of capabilities benefiting customers, employees and shareholders.

Smurfit Westrock has a dual listing on the New York Stock Exchange (NYSE) and the equity shares (International Commercial Companies Secondary Listing) category of the Official List of the UK Financial Conduct Authority. Smurfit Westrock ordinary shares trade on the NYSE and the London Stock Exchange’s main market for listed securities.

We maintain operations in 40 countries, primarily in North America, Latin America and Europe, with some operations in Asia, Africa and Australia. In North America, we are a leader in corrugated and consumer packaging, containerboard and paperboard. In Europe, we are one of the leading companies by production volume in corrugated packaging, containerboard and bag-in-box, and one of the leading producers of consumer packaging. In Latin America, we are a large-scale pan-regional player in corrugated packaging and containerboard.

At the end of 2025 we had operations in 674 facilities, including paper mills, converting plants and other operations. In addition, we own over 308,000 acres of forest plantations, the majority of which are owned in Latin America, which support mill operations in addition to propagating trees for planting.

Our geographic reach is organized around three segments:

- Smurfit Westrock North America (including the U.S., Canada and Mexico);
- Smurfit Westrock Europe, Middle East and Africa (“MEA”) and Asia-Pacific (“APAC”); and
- Smurfit Westrock Latin America (“LATAM”).

The North America; Europe, MEA and APAC; and LATAM segments each include a system of mills and plants that primarily produce a number of grades of containerboard that are converted into

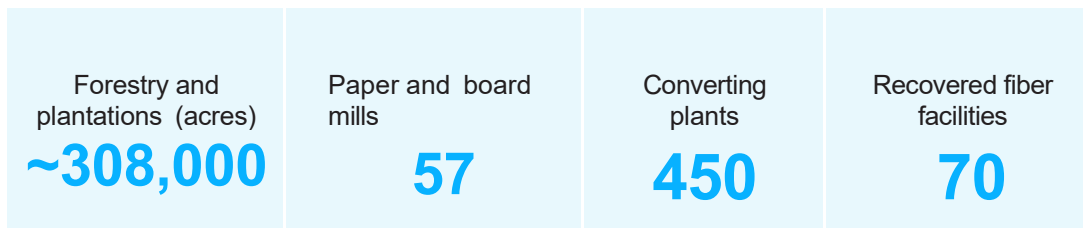
corrugated containers at Smurfit Westrock converting plants or sold to third parties. In addition, the North America segment produces paperboard, kraft paper, market pulp, and other paper-based packaging, such as folding cartons, inserts, labels and displays. The segment also engages in the assembly of displays and the distribution of packaging products.

The Europe, MEA and APAC segment also produces other types of paper, such as solidboard, graphic board, sack kraft paper and machine glazed paper (together known as kraft paper) and graphic paper; paper-based packaging, such as honeycomb, solidboard packaging, folding cartons, inserts and labels; and bag-in-box packaging (the latter with operations located in Europe, Argentina, Canada, Mexico and the U.S., but managed under the Europe, MEA and APAC segment).

The LATAM segment also comprises forestry; other types of paper, such as paperboard and kraft paper; and paper-based packaging, such as folding cartons and paper sacks.

Our global corporate headquarters is located in Dublin, Ireland; our North American operations are headquartered in Atlanta, Georgia, U.S.; our Europe, MEA and APAC operations are headquartered in Amsterdam, the Netherlands; and our Latin American operations are headquartered in Miami, Florida, U.S.

Our Business in Numbers:



Sustainability

Smurfit Westrock understands the challenges facing both our business and the planet, and we are committed to doing our part to address these critical issues. As a global leader in sustainable packaging, we are proud to support the circular economy by creating packaging solutions from renewable and recyclable materials. We are committed to sustainable growth that benefits all our stakeholders, including our suppliers, customers, employees, investors and communities.

Culture and People

People are our priority. Our primary objective is to provide a great place to work for all our colleagues guided by our commitment to equal employment opportunity for all. We understand that our success is driven by our highly valued, motivated and diverse teams across the world. We seek to create safe and inclusive work environments that empower and inspire our people to thrive as we grow our business.

Our Policies Relating to Slavery & Human Trafficking

At Smurfit Westrock, our values of Safety, Loyalty, Integrity and Respect guide our actions. This means operating with the highest level of ethical behavior, which is expected, not only within Smurfit Westrock, but also by our customers, investors, and communities.

Code of Conduct

The Smurfit Westrock Code of Conduct (the “Code”) and related policies set out the ethical standards to which our employees must comply. The Code is based on three principles: compliance with the law, ethical behavior, and a commitment to quality and service. The Code describes how to report concerns about a potential violation of the Code, applicable laws, Smurfit Westrock policies or other unethical conduct. The Speak Up service, which is provided by an independent third-party company, ensures that every employee can report concerns confidentially and even anonymously. The Code also prohibits retaliation against anyone who reports a concern in good faith. Employees receive annual training on the Code.

The Code can be found here: <https://www.smurfitwestrock.com/about/corporate-governance/policies>

Social Citizenship and Respect Policy

Our Social Citizenship and Respect Policy states our commitment to managing our business in accordance with our declared values which recognize that good social citizenship and mutual respect are essential to creating and maintaining a sustainable future. We expect the same from our suppliers who provide products and services that support our business. Our Social Citizenship and Respect Policy takes into account the following international conventions and codes:

- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (core conventions);
- UN Declaration on Fundamental Human Rights;
- Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; and
- UN Global Compact.

Our Social Citizenship and Respect Policy reinforces that Smurfit Westrock will not employ in any capacity any individual who has not reached the mandated school leaving age and the minimum age required for employment in any country in which we operate. Smurfit Westrock strictly prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking.

Due Diligence and Risk Assessment

Our Operations

Transparency and accountability are key attributes of good corporate citizenship. During 2023, through a third-party expert, Smurfit Kappa conducted a human rights assessment, focusing on a review of policies and reporting. A similar assessment was carried out for WestRock in 2024. The assessments were conducted using a best-practices framework and, where opportunities for improvement were identified, provided recommendations for new policies and the refinement of existing policies. The assessments are supporting Smurfit Westrock’s practices, as well as the Company’s preparation for the EU Corporate Sustainability Due Diligence Directive (CSDDD).

Following the combination of Smurfit Kappa and WestRock in July 2024, Smurfit Westrock commenced a double materiality assessment to understand which sustainability topics are most relevant for the combined Company. This assessment is part of the Company’s preparation for its EU Corporate Sustainability Reporting Directive (CSRD) compliant reporting and was conducted in line with the European Sustainability Reporting Standard (ESRS). Among the 11 material topics identified ‘climate change’ and ‘working conditions in the value chain’ include issues relating to forced labor and human trafficking.

Our Direct Supply Chain

In terms of manufacturing inputs Smurfit Westrock procures from suppliers, our key materials are paper and other wood fiber-based materials, starch, chemicals, inks, adhesives and industrial tapes. These materials are used in our primary production process and form the basis for the packaging solutions that we deliver to our customers.

Across the Company, we are explicitly communicating our expectations to our suppliers to support our opposition to slavery and human trafficking and are encouraging suppliers to develop similar compliance programs within their own supply chains.

In addition, within our direct supply chain, we conduct audits of strategic suppliers on a regular basis to assess and mitigate potential risk areas for slavery and human trafficking.

Since 2021, we have reviewed our purchasing spend on sourcing materials, goods and services against country risks based on the risk ranking of the Global Slavery Index. We have progressed this review further during 2025 and have identified that close to 100% of the Company's purchasing spend originates from countries with an A, B, BB or BBB rating.

In addition, suppliers will continue to be encouraged to disclose their assured data in accordance with the Global Reporting Initiative, an independent institution whose mission is to provide a trusted and credible framework for sustainability reporting.

Our Sustainable Sourcing

Our approach to sustainable and responsible procurement goes beyond regulatory requirements. We expect our suppliers to participate in commonly accepted best-practice and certification standards as well, including the following:

- good non-financial reporting under the UN Global Compact, Global Reporting Initiative (GRI) Standards and the Carbon Disclosure Project (CDP);
- preferably reporting social data to the Supplier Ethical Data Exchange (SEDEX);
- adhering to ISO 9001 quality management;
- ISO 14001 environmental management;
- ISO 50001 energy management systems;
- ISO 22001 hygiene management;
- ISO 45001 on safety;
- ISO 46001 water-efficiency management (if applicable to the supplier's industry); and
- food safety standards where relevant.

In addition, to meet the expectation of our stakeholders, including regulators, customers and investors, we have a Smurfit Westrock Supplier Code of Conduct in place, that requires those who do business with the Company to respect and uphold the rights of workers and prohibit the use of child labor and forced labor of any type.

As a responsible business, we also support global human rights and labor standards and expect that our suppliers do so as well. As outlined in the Code, our approach to social citizenship is focused on managing relationships with fellow employees, business partners and host communities in a respectful and socially responsible manner. The Code is supported by our Social Citizenship and Respect Policy which takes into account relevant international conventions and codes.

Where wood and primary fiber-based materials are used as raw materials, we take additional steps to prevent wood from controversial origins being used in the supply chain. We request our suppliers

to be Chain of Custody certified for pulp and paper and we purchase in line with internationally recognized schemes such as Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC), or Sustainable Forestry Initiative (SFI) in the Americas.

For example, FSC chain of custody certificate holders are required to implement the following FSC core labor requirements in their operations:

- No use of child labor;
- Eliminate all forms of forced and compulsory labor;
- Respect and comply with local, state and federal law concerning discrimination in employment and occupation; and
- Respect freedom of association and the effective right to collective bargaining.

The FSC chain of custody certificate holders are required to complete self-assessments in relation to the requirements outlined and are subject to periodic audits. During 2025, our FSC-certified sites completed the self-assessments and were audited to ensure compliance. The relevant sites were able to demonstrate their conformance to the FSC core labor requirements and in doing so have retained their FSC certification.

In addition, the Company is preparing for the introduction of the European Union Deforestation Regulation (EUDR). The EUDR entered into force in 2023, but will apply from 30 December 2026. The EUDR requires that products covered under the regulation must be produced in accordance with the local social and environmental laws of the country of production, including those related to human rights, labor rights and the principle of free and prior-informed consent (FPIC).

Training

We continuously raise awareness and understanding of our commitment to eliminating the risk of forced labor and human trafficking in our direct operations and direct supply chain.

For example, in 2025, senior procurement executives participated in training detailing the provisions of the Modern Slavery Act and our zero-tolerance approach to modern slavery throughout our direct supply chain. That training is planned for 2026 as well.

In addition, as outlined below, our UK operations also provide training aimed at improving knowledge of the Modern Slavery Act in their operations.

Monitoring Performance

Smurfit Westrock undertook a variety of activities during 2025 to monitor our performance against our commitment of zero-tolerance of forced labor and human trafficking in our direct operations and direct supply chain. These activities included the following:

- As outlined in the previous section, the Code sets out the ethical standards with which our employees must comply. It also describes how employees and others can report concerns about a potential violation of the Code, unethical conduct, applicable laws or Smurfit Westrock policies. We did not receive any reports regarding modern slavery concerns in 2025.
- As outlined earlier in the report, during 2025, our FSC-certified sites completed core labor self-assessments and were audited to ensure compliance. The relevant sites were able to demonstrate conformance to the FSC core labor requirements and in doing so have retained their FSC certifications.
- We periodically conduct child labor assessments in high-risk areas of the recovered paper supply chain. In 2025, we visited 76 supplier operations in Argentina, 350 in Mexico, 163 in Colombia and 150 in Brazil. These visits were partly unannounced, and their purpose was to assess whether there was any presence of child labor identified. No cases of child labor were

identified during our visits.

- Details of the further activities aimed at identifying risks of, and verifying the absence of, forced labor and human trafficking, which were conducted in the UK are outlined in detail below.

Our UK Operations

Smurfit Westrock is a market leader in the UK paper-based packaging sector. With an unrivalled product and service offering, informed by outstanding expertise, we provide our customers with innovative and cost-effective solutions to suit a diverse range of products and market sectors. Our national recycling network is strategically placed to collect paper and corrugated waste from anywhere in the UK. Each depot provides a full range of services to either local or national businesses on a high or low volume basis.

Each of our two legacy companies operated businesses in the UK that are now part of the Company: our UK Corrugated, Paper and Recovered Fiber Operation was a part of legacy Smurfit Kappa while our UK Consumer Packaging Operation was a part of WestRock.

Operations and Structure

Our UK Corrugated, Paper and Recovered Fiber Operation includes 2 paper mills, 6 recycling plants, 32 manufacturing operations and various office locations. Our UK external supplier network is predominantly based in the UK and Europe.

Our UK Consumer Packaging Operation encompasses 11 manufacturing facilities and 2 service centres.

Our Commitments

We are committed to the principles of the Modern Slavery Act, ensuring our operations and direct supply chain adhere to its standards.

We promote respect, diversity, fair practices and equitable compensation.

Aligning with the wider Smurfit Westrock group, our UK operations uphold the UN Guiding Principles on Business and Human Rights and the ILO's Fundamental Principles and Rights at Work.

Modern Slavery Policies

In addition to the Company policies relating to slavery and human trafficking discussed previously, Our UK Operations have adopted the following policies:

- in 2025, our UK Corrugated, Paper and Recovered Fiber Operation adopted a Modern Slavery Policy specific to its business; and
- in Q1 2026, our UK Consumer Packaging Operation adopted a separate EMEA Modern Slavery Policy specific to its business.

These policies reinforce a zero-tolerance approach to all forms of modern slavery, including forced labor, servitude, human trafficking and child labor.

Due Diligence and Risk Assessment

Our UK Operations remain committed to taking proactive and preventative steps to ensure that we continue to minimize modern slavery risks and maintain compliance with the Ethical Trading Initiative (ETI) Base Code.

All UK-based units, plants, and depots are assessed in line with either the ETI Base Code or the SEDEX Members Ethical Trade Audit (SMETA) 4-Pillar standard, ensuring regular evaluations of our operations and enabling us to address emerging risks. Formal action plans are developed and reviewed regularly to eliminate potential risks and drive continuous improvement across our direct operations.

Partnership with Unseen UK

Both our UK Corrugated, Paper and Recovered Fiber Operation and our UK Consumer Packaging Operation have partnered with Unseen, the leading UK charity dedicated to preventing modern slavery and supporting survivors. Unseen's specialist expertise in victim support, anti-slavery training, and policy development provides us with critical insight that helps strengthen and refine our modern slavery strategy year after year.

Through this collaboration, our UK Operations benefit from Unseen's subject matter expertise to shape and evolve our approach. Their guidance supports us in proactively identifying areas of risk within our operations, accessing relevant helpline intelligence, and understanding emerging national and regional trends that may impact our workforce or supply chain.

Direct Supply Chain

UK Corrugated Paper and Recovered Fiber Operation

Our UK Corrugated, Paper and Recovered Fiber Operation has a new supplier onboarding platform, designed to proactively assess and engage new suppliers on ethical compliance and modern slavery risks. The platform evaluates suppliers based on country of origin and type of supply, enabling early identification of potential risks during the onboarding process.

In 2025, 100% of new suppliers successfully completed our ethical risk assessment as part of the onboarding procedure. This includes suppliers across a broad range of categories:

- Contractors and Contractor Services (e.g. cleaning, maintenance, engineering, security, catering);
- Transport and Warehousing;
- Material Supply (e.g. machinery, inks, wrap, film, adhesives);
- Temporary Labor Providers;
- Permanent Recruitment Agencies;
- Software and IT Systems Providers; and
- Insurance and Employee Benefit Services.

A total of 387 new suppliers were assessed and onboarded this year, each confirmed to meet our standards for ethical compliance. Importantly, no suppliers were classified as high-risk based on country of origin in line with our risk assessment criteria.

This process supports our commitment to partnering only with responsible businesses and maintaining transparency and accountability across our direct supply chain.

UK Consumer Packaging Operation

Our UK Consumer Packaging Operation employs a risk-based approach in accordance with our internal guidelines to vet suppliers, which includes conducting specific additional due diligence when necessary. When applicable, it also requires suppliers to review and accept the Supplier Code of Conduct, which prohibits the use of forced labor in any form.

Operations

Our commitment to eliminating the risk of forced labor and human trafficking is underpinned by annual assessments across our direct operations. These assessments ensure alignment with recognized ethical standards and support the early identification and mitigation of risk.

Over the course of 2026, our modern slavery strategy will introduce clearly defined key performance indicators (KPIs) to support consistent monitoring and reporting of compliance across the business. These metrics will guide continuous improvement and help ensure that we meet our obligations and commitments to transparency, accountability, and worker protection.

Training

In 2025, our UK Operations continued to strengthen awareness of modern slavery risks through targeted presentations, the integration of SMETA audit requirements, and the use of the new UK Corrugated, Paper and Recovered Fiber's supplier onboarding platform.

Looking ahead, our training and awareness program will focus on:

- Enhancing understanding of modern slavery, human trafficking, and associated risks across all operational levels;
- Strengthening the knowledge of key personnel to identify early warning signs and take appropriate action;
- Ensuring all sites are fully equipped to carry out due diligence and implement risk mitigation strategies;
- Promoting a culture of ethical conduct and openness, underpinned by the principles of the Ethical Trading Initiative (ETI) Base Code; and
- Completing the 'Modern Slavery Policy General Awareness' module, ensuring every employee understands their responsibility in identifying and escalating concerns appropriately.

Monitoring Performance

The senior management teams of our UK Operations continue to play a key role in driving progress towards the mitigation of modern slavery risks. The management teams actively review the business' KPIs to monitor compliance and ensure ethical standards are upheld across all operations.

Our target remains clear: zero incidents of modern slavery within our UK Operations or direct supply chain. We are pleased to report that in 2025, no incidents were identified or reported via our sustainability reporting channels or Speak Up service.

This Statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and has been approved by the Board of Directors of Smurfit Westrock plc, Smurfit Westrock UK Limited, Smurfit Westrock Consumer Packaging Limited, Smurfit Westrock Consumer Packaging UK Limited, Smurfit Westrock Bristol Ltd and Smurfit Westrock Consumer Belfast Limited and is signed on their behalf by Tony Smurfit, Smurfit Westrock President and Chief Executive Officer.



Tony Smurfit
Smurfit Westrock President and Chief Executive Officer