



Supplier Code of Conduct

An Introduction

Smurfit Kappa ("SK"), a FTSE100 company, is one of the leading providers of paper-based packaging solutions in the world, with around 46,000 employees in over 350 production sites across 35 countries and with revenue of €8.5 billion in 2020. We are located in 23 countries in Europe, and 12 in the Americas. We are the only large-scale pan-regional player in Latin America.

SK is dedicated to conducting business in accordance with the highest ethical standards. Our Supplier Code of Conduct ("Code") reflects our dedication to integrity and purpose, compliance with all applicable laws and regulations, ethical behaviour and a commitment to quality and service.

Our Code

The Code applies to all our suppliers worldwide and SK requires its suppliers, their employees, their affiliated entities, their subcontractors, their suppliers, their agents or anyone acting on behalf of the suppliers to comply with the Code. Your responsibility as a supplier of SK is to comply with the Code as well as all applicable laws, regulations and standards.

- **Compliance with the Law:** We understand that the future success of our suppliers depends upon understanding the laws and regulations that apply to their business wherever they operate. We set a minimum (and absolute) standard of compliance with the law but expect our suppliers to hold themselves to higher standards of compliance.
 - Anti-bribery and Anti-corruption: Our suppliers may not offer, promise, or give a financial or other advantage which could be interpreted as a bribe to an employee of SK to encourage him/her to provide a commercial advantage or favour.
 - Fair Competition and Trade Practices: It should be the supplier's policy to comply fully with all aspects of local, national and international competition and anti-trust laws wherever the supplier seeks to do business.
- **Ethical Behaviour:** Our suppliers will maintain a standard of personal behaviour that is fundamentally respectful and fair, where the uncompromising integrity and honesty of every employee is without question.
 - Workforce: Our suppliers will prohibit discrimination, harassment, bullying and other unfair practices in the conduct of their day-to-day business, and they will recruit, hire and train without regard to race, colour, gender, sexual orientation, age, religion, creed, national origin, disability or other legally protected status in the countries where they do business.
 - Social Citizenship: Our suppliers will comply with the principles expressed in the United Nations Declaration of Human Rights and the fundamental Principles and Rights at Work developed by the International Labour Organisation (ILO) and the Ethical Trade Initiative (ETI) Base Code in all of the countries in which the suppliers have a presence.

That means that our suppliers:

- support freedom of association and collective bargaining
- prohibit child labour and forced labour
- treat employees humanely
- respect employee contributions
- compensate fairly with no wage deduction as disciplinary measure
- encourage continuous training and development
- promote community involvement

- **Health and Safety:** Our suppliers will have safety policies, use relevant safety systems and continually seek out ways to improve processes to ensure health and safety.
- **Safeguarding the Natural Environment:** Our suppliers will commit to protect the human and natural environment through the efficient use of resources and actions designed to prevent pollution, promote recycling and the sustainable use of natural resources, minimise waste and respecting Indigenous peoples and traditional livelihoods.
- **Commitment to Quality and Service:** We expect our suppliers to be aligned with our commitment to Quality and Service, and as we strive to contribute with good relationships to the local communities in which SK operates, our suppliers are expected to do the same.

Our suppliers are requested to join the United Nations Global Compact initiative and Sedex (The Supplier Ethical Data Exchange). We ask our suppliers to support, where material, at least the SDG's where Smurfit Kappa can make an impact. These SDG's are: No 15 (Forest), 13 and 7 (Climate change), 12 (Waste), 6 (Water) and 3 (People).

SK created this Code to clarify the principles and expectations for suppliers doing business with SK. These principles are an important part of our supplier selection and evaluation process. The Code supports the Smurfit Kappa Sustainable and Responsible Sourcing Policy. Our suppliers shall take note of, and adhere to, both the Policy and the Code. Our suppliers shall implement the appropriate monitoring and compliance programs to ensure adherence to this Code as well as to relevant laws and regulations. Compliance to the Code is confirmed by signing a declaration in a three year cycle. SK will audit its suppliers in a three year cycle to monitor and ensure compliance with this policy. Primary focus will be on suppliers of SK's key materials.

SK expects its suppliers to communicate this Code appropriately to their affiliated entities, their employees, subcontractors, suppliers, agents and others with whom our suppliers do business in their supply chain.

SK will evaluate the Code from time to time in light of new developments in any relevant area.

For more information

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