

TAX STRATEGY

Background

This statement of Smurfit Westrock's tax strategy ("Tax Strategy") sets out the Group strategy for conducting the Group's tax affairs in those countries where we do business and the processes and procedures for managing risk. This Tax Strategy applies globally across all Smurfit Westrock operations where we do business and it applies to all Officers, Executive Directors, Non-Executive Directors, employees, contractors, agency and temporary staff, who are responsible for or have an impact upon the execution of the Tax Strategy.

Smurfit Westrock Plc ("Smurfit Westrock") was created in July 2024 as a strategic combination between Smurfit Kappa Group plc, one of the leading integrated corrugated manufacturers in Europe with a large scale pan-regional presence in Latin America, and WestRock Company, one of the leaders in North America in corrugated and consumer packaging solutions and a multinational provider of sustainable fibre-based paper and packaging solutions. Smurfit Westrock has approximately 97,000 employees in over 500 production sites across 40 countries primarily in North America, Latin America and Europe, and with some operations in Asia, Africa and Australia. Our products, which are 100% renewable and produced sustainably, improve the environmental footprint of our customers. Smurfit Westrock's shares are listed on the NYSE.

Our Approach to Tax

Smurfit Westrock is committed to complying with both the letter and spirit of tax laws globally in a fair and responsible manner, ensuring compliance with all laws and relevant regulations in the countries in which we operate, and submitting all tax returns and documents to tax authorities on a timely basis and that the correct amount of tax is paid at the right time. To this end, Smurfit Westrock employs experienced and qualified tax professionals at Group and at a regional and country level to manage its tax affairs and risks, and we work with external professional advisors when dealing with complex issues, uncertainties and transactions. Tax team members participate in ongoing professional development and receive relevant training on new legislation, and to maintain tax risk awareness.

Our business operations generate a significant amount and broad range of taxes including corporate income taxes, value added taxes, employment taxes, wealth taxes, customs duties, environmental levies, property taxes and other transaction taxes, which we are committed to paying in a timely and accurate manner in all jurisdictions. The tax team works with the business to ensure a clear understanding of the tax consequences of material transactions and the implementation of transactions in accordance with the Tax Strategy.

Smurfit Westrock applies arm's length principles in the pricing of all intra group transactions in accordance with OECD guidelines and local laws, aligning with our operating business model and commercial substance.

We recognise our responsibility to manage our tax affairs efficiently on behalf of our shareholders to deliver returns on their investments. This includes managing a sufficient level of tax contribution, and this contribution plays a significant role in the communities where we operate, and we do not engage in aggressive tax planning. We ensure our effective tax rate appropriately reflects the commercial activities of the Group, making use of Government incentives and reliefs that align with economic development objectives and support investment and innovation. Our Tax Strategy aligns with our broader sustainability objectives, and we aim to make a positive impact through responsible tax practices.

Governance and Oversight

Tax governance is embedded within our broader financial control framework. Our Tax Strategy has been approved by our board and responsibility for the conduct of our tax affairs is delegated by our board to the Executive Vice President and Chief Financial Officer. The Executive Vice President and Chief Financial Officer is accountable for the conduct of the Group's tax affairs and to this end is supported by a Group tax team as well as country-based tax and finance resources and external advisors as necessary.

The Group operates a distributed risk model that ensures there is robust oversight and control at the Group level while ensuring primary responsibility for all business tax affairs is maintained at local business and regional level. The CFO in each country or business is responsible for the implementation of our Tax Strategy which encompasses all elements of the tax life cycle from tax compliance, through controllership, planning, risk management, audits and controversy. The business tax and finance teams work in close collaboration with the Group tax team in the execution of the Tax Strategy.

We identify, consider and manage tax risks and appropriately record them as part of our tax controllership and reporting processes throughout the financial period at both group and country level. The tax provisions and calculations are subject to regular review and scrutiny by the Group tax team. We have developed robust internal policies and procedures that ensure consistency and accuracy across operations in all countries.

Our tax provisions and disclosures arising from the implementation of our Tax Strategy are reviewed annually by our external auditors and the results are presented to the Audit Committee. In addition, the Group's tax affairs are covered by the Group's Sarbanes-Oxley controls.

Risk Management

Tax law is complex and open to interpretation which can create uncertainty. Smurfit Westrock adopts a cautious approach to tax risk with a low risk tolerance across the Group. Advance tax clearances may be sought for material transactions to ensure compliance and certainty.

Relationship with Tax Authorities

Smurfit Westrock is committed to always acting with integrity, maintaining a transparent, collaborative and constructive relationship with tax authorities and to undertake any such dealings in a professional and timely manner. We aim to resolve issues promptly and constructively and to participate in initiatives that promote simplification and clarity in the tax system. We engage with international initiatives to improve and simplify tax regimes to achieve a balance that promotes greater transparency, while also incentivising investment and growth in countries in which we operate.