

SMURFIT WESTROCK ROERMOND PAPER B.V.

SUPPLIER REGULATIONS

(Suppliers of residual materials, raw materials, additives and other goods; valid for suppliers arranged by SWRP)

WORKING CONDITIONS, ENVIRONMENTAL PROTECTION AND FIRE SAFETY

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0 DEFINITIONS

Nomenclature

References to Smurfit Westrock Roermond Paper ('SWRP') mean the entire site (including the combined heat and power plant, the water treatment plant and the port area).

Contact person

The employee designated by and on behalf of SWRP to maintain contacts between the Supplier and SWRP.

QESH Manager

Quality, Health, Safety & Environment Manager; the employee appointed by SWRP to advise on and coordinate all matters concerning quality, working conditions, environmental protection and other designated activities at the site concerned.

Supplier

A company (and its employees) present at the SWRP site to make a delivery in which environmental protection, working conditions and fire safety aspects may play a role during the delivery. If necessary, binding additional agreements are made per supplier.

Raw materials

New paper, waste paper and fibre products used in paper production.

Additives

Solid and liquid substances used in paper production and the associated processes.

Fuels

LPG and diesel fuel used for on-site transport.

Biological sludge (aerobic, anaerobic) and sulphur-containing sludge

Sludge required for the treatment of process water or produced as a result of such treatment.

1 ALARM SIGNALS

Uninterrupted siren (beeping —————): **fire alarm**

Interrupted siren (beeping - - - - -): **evacuation alarm**

2 INTRODUCTION

It is part of the policy of Smurfit Westrock Roermond Paper (SWRP) to assure, in an effective and cost-efficient manner, the company's working conditions (safety, health and welfare), to protect the environment, and to ensure fire safety at a level that at the very least satisfies the prevailing legislation. The above is in line with the Smurfit Westrock Group 'Health and Safety Policy Statement'. See Appendix 1. The company's vision with respect to working conditions and environmental protection is zero accidents and incidents, both for its own employees and for third parties working for the company.

SWRP prefers to engage suppliers certificated according to VCA* and VCA**, ISO 9001 and ISO 14001 and/or equivalent. Foreign firms should hold certification equivalent to VCA (e.g. German firms must hold an SCC certificate).

It is prohibited for employees of the supplier to perform work at the SWRP site if SWRP has not received a statement of acceptance of these Supplier Regulations, duly signed by an authorised person on behalf of the supplier.

3 RESPONSIBILITIES

Suppliers working on the SWRP site have the following responsibilities:

- Suppliers must comply as a minimum requirement with prevailing legislation covering working conditions, environmental protection, and fire safety (see section 8).
- Suppliers must comply with the provisions of these Supplier Regulations.
- Suppliers must refrain from employing illegal persons; all workers must identify themselves to the supplier with valid means of identification prior to starting work. Workers must carry valid means of identification with them at all times, and must hold a valid work permit if they are from outside the European Economic Area (EEA). Workers must carry their work permit with them at all times.
- Suppliers must ensure that only properly trained and competent workers are engaged for the work, and that workers are familiar with the contents of these Supplier Regulations. Workers' competence must be demonstrated at the request of SWRP. Engaged workers must have a command of Dutch, German and/or English. Other languages only after appointment. At least one of those languages to a degree that allows instructions to be given and understood in a reasonable manner and enables the exchange of information.
- The supplier must ensure strict compliance with the loading and unloading procedure. Only employees of SWRP are authorised to release an installation for use.

For the purposes of these Supplier Regulations, 'legislation', 'statutory provisions' and similar expressions shall mean particularly but not exclusively those provisions made under the Working Conditions Act, the Dangerous Equipment Act, the Working Hours Act and their respective implementing decrees, as well as the Tobacco Act, relevant Health & Safety at Work Bulletins issued by the Labour Inspectorate / Directorate-General of Labour, relevant provisions in the Commodities Act, and the Environmental Management Act and its decrees.

The purpose of the Supplier Regulations is to protect the environment, all persons present on-site, all machines, equipment and installations, and the finished products of SWRP, and to prevent damage caused by or as a direct consequence of work performed by (employees of) third parties on behalf of SWRP.

A contact person will be named to enable the supplier to be as fully informed as possible of the situation in, on and around buildings and installations of SWRP.

The supplier and its employees must request the name of the contact person if they do not know who it is.

The supplier must ensure that its presence and the presence of its employees on the site and in the buildings of SWRP do not impede the progress of the work of SWRP or third parties, unless prior permission has been given.

SWRP selects its suppliers according to criteria that include accreditation and qualification of competence. The attitude of suppliers towards environmental protection and working conditions plays a role in the selection process. The activities of employees of third parties performing work on behalf of the supplier shall also be taken into consideration.

Employees of the supplier are not allowed to go outside the relevant section of the workplace and/or the usual connecting routes.

4 ENTERING AND LEAVING THE COMPANY PREMISES

Suppliers are not allowed to enter or drive onto the company premises without the express permission of the gatekeeper.

The gatekeeper will record the following information:

- Date and time of entering and leaving the company premises
- Number and names of persons entering or leaving the company premises
- Contact person

Delivery of raw materials and additives

Advance notice must be provided of deliveries of raw materials and additives. Admission to the company premises will be denied if no advance notice has been given.

After the gatekeeper has registered the delivery, the supplier will be informed about the unloading location and the contact person who will be present at the unloading location. The supplier must first contact the contact person. Unloading may only commence with the express permission of the contact person and under his supervision.

Suppliers must report to the gatekeeper upon leaving the company premises. The gatekeeper will register the fact that the relevant person(s) has/have left the company premises.

If an employee of a supplier is performing work at the SWRP premises for the first time, he must report this to the gatekeeper. The gatekeeper will provide the employee with further instructions concerning the safety requirements and rules of conduct that apply to the work he has come to perform.

Similar instructions as described above apply to the loading of additives, residual materials and waste materials.

Workers may not be accompanied on the company premises by children, pets or third parties whose presence is not required for the work.

5 BRINGING ITEMS ONTO THE PREMISES

It is prohibited to take photographs and/or record film at the SWRP site without the prior permission of the contact person.

Employees of third parties are not allowed to bring onto the site any fireworks or other explosive or combustible substances, unless the contact person has given permission to do so and the substances are needed for essential contracted work.

6 REMOVING GOODS FROM THE PREMISES

A permit is required to remove from the site any goods that are or were the property of SWRP. Such permits will be issued by a person in authority at the relevant department or by the project manager. When leaving the SWRP site the permit must be handed to the gatekeeper at the weighbridge. The gatekeeper is authorised to check vehicles and persons for the unauthorised removal of goods that are property of SWRP.

7 CONSUMPTION OF ALCOHOL, DRUGS AND MEDICINES

It is prohibited for employees of suppliers to be under the influence and/or in possession of alcohol and/or drugs on the site. In addition, employees may not be under the influence of medication to an extent that jeopardises their own safety or that of others. Violation of this rule will result in immediate removal from the site and denial of access in future. SWRP has the right to ask you to take an alcohol test. Refusal to participate in such a test will result in immediate removal from the site.

8 WORKING CONDITIONS, ENVIRONMENTAL PROTECTION AND FIRE SAFETY

8.1 General provisions

8.1.1 Liability

The supplier shall be liable for the consequences of any failure by its employees to comply with legal and other requirements and with issued instructions. This matter will be governed by Dutch liability law.

The foregoing leaves intact the employees' individual responsibility under prevailing legislation.

8.1.2 General safety requirements

- Jewellery such as bracelets, rings and necklaces may not be worn if there is a risk they will be caught up or pulled in.
- Long hair must be tied up to rule out the risk of it becoming caught up or pulled in by moving parts.
- Special care must be taken in the proximity of forklift trucks because they may have a longer braking distance.
- Machines/installations of SWRP used for production and other purposes may be switched on and off only by the company's own employees.
- Always follow the instructions given on signs on the company's site and in its buildings.

8.1.3 Hazardous substances and materials

It is obligatory to take adequate measures to ensure the safe and correct transport, use, loading and unloading of substances and/or materials which carry an increased risk.

The indications and labels used for hazardous substances must meet the requirements of the GHS (Globally Harmonised System of classification and labelling of chemicals) system of the United Nations.

The supplier is responsible for the removal of its residual substances and/or materials.

8.1.4 Hazardous and nuisance-causing activities

As used in these Supplier Regulations, 'hazardous and nuisance-causing activities' include:

- Activities with a risk of serious injury due to the start-up (unexpected or otherwise) of an installation or parts thereof
- Activities capable of causing noise or vibrations resulting in nuisance for people in the vicinity. It is not allowed to knock on the bulk tanks during unloading.
- Activities capable of interfering with electronic equipment (control and other equipment)
- Activities in an explosion zone

The above activities that may endanger persons and/or goods of SWRP may be performed only if the specific company requirements for such activities have been complied with.

Equipment and/or installations (including test installations) owned or rented by the supplier must satisfy prevailing legislation covering health and safety at work and environmental protection. The supplier must ensure the possession of any permits and/or inspection certificates that are required. These permits and/or certificates must be presented at the request of the client or its authorised representative.

Additives/chemicals and similar may be loaded or unloaded only if the relevant company requirements of SWRP are complied with, and if the contact person has given permission. Loading and unloading equipment and/or installations (including test installations) must not be started up until they have been inspected and approved by the contact person.

8.1.5 Orderliness and neatness

The supplier is responsible for maintaining orderliness and neatness in his work area. The supplier must ensure that the workplace is clean and tidy after the work has been completed.

Matters that must receive attention include:

- Keeping free walkways, roads, emergency exits and operating equipment
- Keeping free and maintaining easy access to first-aid materials, water hydrants, fire hoses, fire valves, small extinguishers, manhole covers, emergency showers, transport routes and passages
- Preventing the risk of persons slipping and stumbling
- Making sure that no materials are left behind upon completion of the work

Breakfast, lunch, coffee and similar may be taken only in the designated/indicated places and canteen(s) for that purpose.

8.1.6 Supplementary instructions

Supplementary instructions that the contact person issues in respect of working conditions, environmental protection and fire safety must be followed in all instances.

8.1.7 Environmental protection

It is obligatory for the supplier to comply with environmental legislation, including the environmental licence of SWRP. In particular the supplier must devote attention to:

1. Noise: Work may be performed outdoors on the site in the evening and during the night (i.e. between 10:00 p.m. and 6:00 a.m.) only if it does not cause excessive noise. Among other things this means no noise from radios and no hitting of empty tanks or pipes.
2. Waste: Residual substances must be separated into industrial waste and hazardous waste. Unused residual substances must be removed by the supplier in accordance with legal requirements (if the supplier holds a licence for such removal), unless different arrangements have been agreed in writing with the contact person. Residual substances and waste may not be left behind or discarded in sewers, wells and drains.
3. Soil: Liquids must not be released into the soil. The supplier must put measures in place to prevent leaks during the unloading of tank trucks. Every leak caused by the supplier must be cleaned up by the employees of the supplier, and reported immediately to the contact person. If necessary the earth/soil must be cleaned or tidied up at the expense of the supplier.
4. Sewers: It is not permitted to rinse away spilt chemicals and/or additives into the company's sewer system.

8.2 **Personal protective equipment**

- The wearing of safety shoes with steel noses that meet at least the S2 standard is obligatory during all work performed at the SWRP company premises.
- The obligatory wearing of other personal protective equipment – such as helmets, ear protectors, safety glasses and prominent clothing like safety jackets – will be indicated by means of pictograms or instructions on the safe handling of chemicals, made known at the time of contracting the work, or be a legal requirement. If necessary, additional instructions concerning the wearing of personal protective equipment will be decided in consultation between the client and the supplier.
- Employees of the supplier will be required by the supplier to wear personal protective equipment during the performance of specific activities (e.g. unloading of chemicals). The supplier must notify SWRP in writing, and must enclose or attach photographs of the obligatory personal protective equipment.
- It is obligatory to wear ear protectors in most areas of the company site (this is indicated by signs).
- Suppliers must make available the personal protective equipment required by their employees.
- The use of an item of personal protective equipment may be indicated by safety signs, stated in a work permit, or prescribed by the client.
- The supplier must instruct its employees in how to use the prescribed personal protective equipment.
- The supplier must ensure that all workers working on its instructions use and wear the appropriate personal protective equipment in the correct manner.
- Important: Contact lenses are not protective equipment.

8.3 **Equipment and tools**

The equipment and tools used to perform work must satisfy the applicable legal requirements. The supplier must ensure the presence of adequate equipment and tools. They must be

approved in good time (in accordance with legal requirements) and must be provided visibly with an approval sticker. Equipment and tools that the client or its representative deems unsound, unsafe or not approved on time must be removed from the SWRP site. Borrowing equipment and tools from SWRP is discouraged.

8.3.1 General

If any situations occur that make it impossible to comply with the requirements of sections 8.2 and 8.3, there must be consultation with the contact person and/or QESH Manager.

8.4 **Marking / cordoning off unsafe situations**

Every supplier is required to take measures to cordon off hazardous situations and/or activities in the proper manner. This includes:

- Unloading of chemicals (observance of safe distances)
- Discharge hoses on floors / walkways and the associated risk of stumbling
- Open voltages (at the discretion of the person responsible for the work)
- Rotating and moving parts, etc.

If the risk for which the cordoning off is intended is unclear, it must be indicated nearby by means of pictograms and/or notices.

8.5 **Traffic regulations and instructions for loading/unloading**

The entire outdoor site is open to pedestrians, except for zones indicated by pictograms and signs. The wearing of a safety jacket is obligatory at all outdoor sites where transport movements may occur and in the rooms/areas where paper and/or paper reels is handled.

General road safety laws apply on the company's sites.

The parking spaces for vehicles used solely for transporting persons will be designated by the SWRP contact person or by the gatekeeper.

It is not allowed to park motor vehicles on the SWRP site without a parking card. A parking card may be obtained from the contact person for motor vehicles needed to transport materials and/or perform work, if the supplier needs to be present on the company premises for a longer period than required for loading or unloading. Parking is allowed only at the designated locations on the site with a parking card. The parking card must be placed visibly behind the windscreen.

Suppliers arriving at the site to load or unload raw materials or additives do not require a parking card. They will be informed of their loading/unloading location after reporting to the gatekeeper.

The general maximum speed limit for vehicles on the SWRP site is 20 km/h. Where indicated, this speed may be lower.

SWRP vehicles must not be hindered in their activities.

Any deviations from the rules stated above must be discussed with and approved in writing by the contact person.

8.5.1 Inward and outward movement of goods to/from Central Technical Warehouse

- Loading and unloading operations must be performed by employees of the Central Technical Warehouse during their normal working hours (Mondays to Fridays from 7:30 a.m. to 12:30 p.m. and from 1:00 p.m. to 4:00 p.m.).
- Loading and unloading on Thursdays should be avoided in connection with the weekly shutdown.
- In principle there must not be any loading or unloading outside normal working hours.

Exceptions

Scheduled loading/unloading

- The supplier has discussed the loading/unloading operations with the SWRP contact person.

Unscheduled loading/unloading

- Any loading or unloading necessary before 7:30 a.m. or after 4:00 p.m. must be reported to the gatekeeper. After consulting internally the gatekeeper will indicate the possibilities that exist.

Specific instructions apply to the loading/unloading activities listed in section 8.5.2 below. These instructions form part of the terms and conditions of purchase and must be strictly observed. Goods transport and loading/unloading of goods at the SWRP site may only occur between 6:00 a.m. and 10:00 p.m.

Due to the site's proximity to residential areas, additional requirements apply to the noise produced by goods transport, loading and unloading.

8.5.2 Loading and unloading regulations

SWRP has drawn up internal company regulations for the loading / unloading operations listed below. The gatekeeper will provide suppliers with these instructions or they will be available at the loading / unloading location. Please note that the list is not exhaustive.

- Delivery of additives and chemicals
- Delivery of waste paper (raw material) and paper residue
- Loading of finished product (rolls of paper)
- Removal of residual materials (e.g. waste iron, household waste, industrial waste)
- Removal of hazardous substances (e.g. oil, chemicals)
- Delivery and removal of anaerobic sludge
- Loading of Rofire® pellets

8.6 Fire safety

8.6.1 Smoking ban

A smoking ban is in force throughout the SWRP site, including in lorry cabins. Smoking is allowed only in the smoking shelters.

8.6.2 Fire prevention

Measures must be taken to rule out the possibility of a fire breaking out and/or an explosion occurring during all work, particularly work that involves use of naked fire. Hot vehicle exhaust pipes (particularly catalytic converters) can cause fires.

Cars and lorries are not allowed in/near explosion zones, which are clearly indicated by signs.

Fire prevention measures must at the very least include the presence in the vehicle of sufficient approved small extinguishers suitable for putting out a potential fire.

8.6.3 Fire reports and alarms

To report a fire or serious incident:

- * Dial the internal alarm number (using an internal extension).

Gatekeeper: number **300**

When using a mobile phone, dial: **0475 384444**

State the building and the floor where you are located and, if possible, give a more detailed description of the place where fire has broken out or where the incident has occurred.

Watch out for your own safety. Be sure not to get trapped by fire or smoke.

- Read the directions for use on the extinguishers that are present.
- Try to put out the fire.

Important! Every fire that breaks out, even if you have extinguished it, must be reported to the contact person.

An uninterrupted siren will sound on the site if there is a fire alarm.

- The air raid-sirens are tested on the first Monday of every month at 12:00 noon.

8.6.4 Training requirements (use of small extinguishers)

Work involving any risk of fire must be reported to SWRP. The persons who will perform the work must have been instructed by or on behalf of the supplier in the use of small extinguishers.

8.6.5 Insurance

The supplier is required to take out fire insurance to cover any damage caused by fire. The Procurement department must be consulted regarding insurance coverage.

8.7 **First aid**

The company's first-aid stations indicated by a pictogram may be used to treat injuries. If a serious accident occurs it is possible to obtain help by dialling the central alarm number

(gatekeeper: number **300**, when using a mobile phone, dial **0475 384444**).

Accidents must be reported to the contact person or gatekeeper.

8.8 **Emergency facilities**

Prior to starting the work, suppliers must familiarise themselves with the locations of:

- Buttons for sounding the alarm
- Telephone extension in the immediate vicinity
- Escape routes
- Emergency facilities
- Assembly point (new canteen)

8.9 Miscellaneous

If applicable, the following subjects will be discussed during talks on the order, contract or project:

- Use and location of places to take breaks, toilets and canteen facilities
- Use of personal protective equipment within the meaning of section 8.2
- Compliance with relevant legislation covering health and safety at work and environmental protection
- Essential deviations from the rules may be discussed with the client, and any arrangements agreed in that respect must be confirmed in writing by the Procurement department
- Previous incidents (if any) and adherence to agreed arrangements

Regular progress meetings will be held at the discretion of the contact person. The frequency of such meetings will be agreed by the parties concerned.

9 UNFORESEEN CIRCUMSTANCES

Deviations from the general rules of conduct require the prior permission of the contact person. In case of doubt or situations not covered by these Supplier Regulations, it is obligatory to contact the contact person and/or QESH Manager. Failure to do so will relieve SWRP of all liability for any damage that may occur.

10 RECOVERY OF DAMAGE

Any damage arising due to failure to comply with these rules of conduct will be recovered from the supplier. This same applies to damage caused by unlawful acts of employees of the supplier.

11 STATEMENT OF ACCEPTANCE

The undersigned hereby duly accepts the Supplier Regulations (version 05 dated 30-07- 2026) of Smurfit Westrock Roermond Paper B.V. :

Name:

Company stamp:

Date:

Position:

Signature:

Return to the Procurement department of Smurfit Westrock Roermond Paper B.V.

Appendix1



Global Health & Safety Policy

Our Vision

To operate with health, safety and wellbeing as core values to prevent injuries, engage and empower our colleagues, and continually improve our safety processes so that everyone goes home safe every day.

Our Guiding Principles

Guided by our values and Global Code of Conduct, Smurfit Westrock has established the following principles for working safely and promoting wellbeing in our workplaces:

- **Culture of caring.** We foster a culture of health, safety and wellbeing founded on authenticity, empowerment and accountability. We look after ourselves and care about each other. Everyone has authority to speak up or act without fear of retaliation whenever they perceive an unsafe situation.
- **Accountability.** Working safely starts at the top. Senior management is accountable for providing a healthy and safe working environment and supporting the health and safety program. Line managers are responsible for the health, safety and wellbeing of their teams and ensuring that all employees and contractors understand and deliver on their individual health and safety responsibilities. Every employee is expected to participate in safety and health activities, including following safe work practices, wearing required personal protective equipment, and promptly reporting hazards and incidents.
- **Risk management.** We strive to reduce the risk of illnesses and injuries. We systematically assess health and safety hazards and risks and implement controls to eliminate, prevent, or reduce them.
- **Communication.** We encourage open and transparent reporting of health and safety concerns and incidents and strive to ensure that information on health and safety matters flows freely throughout the organisation.
- **Learning.** We educate and invest in people to enable them to be effective health and safety leaders, irrespective of title. We share learnings from incident investigations, operational learning events, and industry best practices. Education and coaching for safe behaviour are desired, but if something appears unsafe or unhealthy, we intervene and engage proactively.

- **Compliance.** As a minimum, we comply and expect our employees, contractors, suppliers, and visitors to comply with applicable health and safety legal requirements and company expectations. We promote effective governance and compliance with regular audits to assess conformance with company health and safety standards and legal obligations.
- **Continual Improvement.** We include health, safety and wellbeing considerations in our business decisions, establish and monitor meaningful safety metrics and targets, and promote safety improvements through honest reflection and review of our performance. We engage with interested stakeholders to keep abreast of safety developments and leading practices.

Our Commitment

Senior management will provide the resources necessary to implement this policy and conduct periodic reviews to ensure its ongoing effectiveness. Line management is responsible for ensuring that this policy is understood, effectively communicated and implemented. Employee involvement in safety is essential, and each employee is responsible for understanding the impact of this policy on their daily work activities and practicing our guiding principles. This policy is communicated to all employees and is available to interested parties through our corporate website.



Tony Smurfit
President &
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Saverio Mayer
CEO & President
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Pim Wareman
CEO Recycled
Paper Europe

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