

Task Force on Climate-Related Financial Disclosures ('TCFD')

Our disclosures are consistent with the recommendations of the TCFD and should be read in conjunction with the climate section of this report on pages 30-37. Further information can be found on our website at smurfitwestrock.com/sustainability. In addition, as part of our reporting process, we have considered the recommendations outlined in the Financial Reporting Council ('FRC') reports, 'CRR Thematic review of TCFD disclosures and climate in the financial statements' and 'CRR Thematic review of climate-related metrics and targets'. We expect that certain aspects of our disclosure will further develop and evolve over time. Over the course of 2026 and beyond we expect to:

- continue to develop our strategy and transition plan towards our 2030 target and net zero ambition;
- continue our preparation for our CSRD reporting;
- continued evolution of our Scope 3 understanding and strategy;
- exploring having our climate targets science based validated; and
- further develop our understanding of the climate risks and opportunities for our organization.

Smurfit Westrock TCFD Index

| Area | Recommended Disclosures | Source | Page(s)/Section |
|---|--|----------------------|---|
| Governance | | | |
| Disclose the organisation's governance around climate related risks and opportunities. | a) Describe the board's oversight of climate-related risks and opportunities. | ISAR 2025 SR 2025 | ISAR: 41-52 SR: 96-97 |
| | b) Describe management's role in assessing and managing climate-related risks and opportunities. | SR 2025 | SR: 98 |
| Strategy | | | |
| Disclose the actual and potential impacts of climate related risks and opportunities on the organisation's businesses, strategy, and financial planning where such information is material. | a) Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long-term. | SR 2025 | SR: 122-128 |
| | b) Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning. | SR 2025 | SR: 122-128 |
| | c) Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario. | SR 2025 | SR: 30-37, 122-128 |
| Risk Management | | | |
| Disclose how the organisation identifies, assesses, and manages climate-related risks. | a) Describe the organisation's processes for identifying and assessing climate-related risks. | ISAR 2025 SR 2025 | ISAR: 17-29, 32-36 SR: 129 |
| | b) Describe the organisation's processes for managing climate-related risks. | ISAR 2025 SR 2025 | ISAR: 17-29, 32-36 SR: 129 |
| | c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management. | SR 2025 | SR: 129 |
| Metrics and Targets | | | |
| Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material. | a) Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process. | SR 2025 | SR: 35-37, 47, 50, 52-53, 57, 110, 113, 129 |
| | b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas ('GHG') emissions, and the related risks. | SR 2025 | SR: 35-37, 110, 129 |
| | c) Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets. | SR 2025 | SR: 8-9, 129 |

ISAR – Irish Statutory Annual Report
SR – Sustainability Report