



Supplier Code of Conduct

An Introduction

Smurfit Kappa Group ('SKG' or 'the Group'), a FTSE100 company, is one of the leading providers of paper-based packaging solutions in the world, with approximately 48,000 employees in over 350 production sites across 36 countries and with revenue of €10.1 billion in 2021. We are located in 23 countries in Europe, and 13 in the Americas. We are the only large-scalepan-regional player in Latin America.

SKG is dedicated to conducting business in accordance with the highest ethical standards. Our Supplier Code of Conduct ('Code') reflects our dedication to operating sustainably with integrity and purpose, and complying with all applicable laws and regulations, good business ethics and a commitment to quality and service.

Our Code

The Code applies to all our suppliers worldwide and SKG 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 SKG 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 SKG 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 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 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
- provide fair compensation with no disciplinary wage deduction
- encourage continuous training and development
- promote community involvement

- **Health and Safety:** Our suppliers will have safety policies, use relevant safety systems and continually seekout ways to improve processes to ensure good health and safety practices.
- **Safeguarding the Natural Environment:** Our suppliers will commit to protect the human and natural environment through the efficient use of resources. Our suppliers will focus on preventing pollution, will promote recycling and the sustainable use of natural resources, minimise waste and will respect 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 SKG 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 require our suppliers to align their sustainability policies and targets with their material UN SDGs.

SKG created this Code to clarify the principles and expectations for suppliers doing business with the Group. 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 programmes 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. SKG will audit its suppliers in a three year cycle to monitor and ensure compliance with this policy. The primary focus will be on the suppliers of SKG's key materials.

SKG 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.

SKG will evaluate the Code from time to time considering new developments in any relevant area.

For more information:

Group Sustainability Department

Smurfit Kappa

Beech Hill, Clonskeagh, Dublin 4, Ireland

+353 1 202 7000

www.smurfitkappa.com

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Garrett Quinn

Group Chief Sustainability Officer

+353 1 202 7000

Garrett.Quinn@smurfitkappa.com