

## WestRock Canada

### 2023 Modern Slavery Report

#### 1 Introduction

This report constitutes the first report prepared by WestRock Canada (as defined below) pursuant to the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). It is a joint report (“**Report**”) made by WestRock Company of Canada Corp. and Multi Packaging Solutions International Limited (together, the “**Reporting Entities**”) for the financial year ended September 30, 2023 (the “**Reporting Period**”).

This Report relates to the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Reporting Entities (collectively, “**WestRock Canada**”, “**our**”, “**us**” or “**we**”).

#### 2 Steps taken to prevent and reduce the risks of forced labour and child labour

In general terms, WestRock Canada took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in its business and supply chains:

- initiated the mapping of certain key and critical suppliers (“**Tier 1 suppliers**”);
- conducted a preliminary assessment of WestRock Canada’s current policies and procedures related to forced labour and child labour and identified certain opportunities that may exist for us to strengthen human rights considerations in our supply chains and operations;
- continued to implement due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organisation’s activities and supply chains;
- continued making requests to certain of our Tier 1 suppliers that they have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains;
- continued to implement anti-forced labour and child labour contractual clauses in contracts with certain Tier 1 suppliers and also other suppliers;
- gathered information on worker recruitment and maintained internal controls to ensure that all workers are recruited voluntarily;
- conducted a preliminary internal assessment of the risks of forced labour and/or child labour in our activities and supply chains;
- monitored certain Tier 1 suppliers through our Supplier Evaluation and Appraisal due diligence

process; and

- engaged with Aim Progress, a forum of leading Fast Moving Consumer Goods (FMCG) companies and common suppliers, assembled to understand the key watchouts for forced labour and child labour, and to enable and promote responsible sourcing practices and sustainable supply chains as part of our Responsible Sourcing program.

Details on the foregoing are set out in further detail in this Report.

### **3 Structure, activities, and supply chains**

#### **3.1 Structure**

WestRock Canada is a manufacturer of paperboard and fiber-based packaging solutions. Guided by our values of integrity, respect, accountability and excellence, we use leading science and technology to move fiber-based packaging forward on a sustainable basis.

WestRock Canada's ultimate parent company is WestRock Company, which has its head office in the United States. Multi Packaging Solutions International Limited, WestRock Canada's direct parent company, is a holding company existing under the laws of Bermuda.

WestRock Canada also has a few controlled, indirect subsidiaries which are involved in providing packaging products in Argentina and Chile.

WestRock Canada employs approximately 3125 full- and part-time employees in its operations, all of whom are located in Canada, with roles in manufacturing, shipping/receiving, maintenance and repair, materials scientists, engineers, packaging designers, information technology specialists, administration and management, finance, human resources, sales, marketing, procurement, logistics, distribution and legal services.

#### **3.2 Activities**

WestRock Canada manufactures and provides innovative, sustainable, fiber-based paperboard and packaging solutions for consumer and corrugated packaging markets. The WestRock Company community of more than 55,000 employees supports customers around the world from locations in North America, South America, Europe, Asia and Australia. Our extensive network of paper mills and converting and recycling facilities, our capabilities in automation technology and materials science, and our legacy in sustainable forestry position us to strive for a sustainable future.

WestRock Canada owns and operates fifteen manufacturing locations in several provinces across Canada.

WestRock Canada imports goods such as containerboard, paperboard, chemicals, inks, starch, and other raw material inputs into Canada for our operations, originating primarily from North America. WestRock also purchases manufacturing equipment from Original Equipment Manufacturers (OEMs)

and other suppliers located primarily in North America and Europe.

### **3.3 Supply Chains**

WestRock Canada sources goods (for both resale and internal business use) from suppliers operating in a variety of industries, including raw materials such as virgin and recycled fiber, paperboard, containerboard, chemicals, caustic soda and starch, energy, equipment and information technology hardware. We source the majority of our raw material goods and services from direct suppliers located in North America. We source the majority of our equipment and information technology hardware from OEMs or distributors located in North America and Europe.

WestRock Canada sources required external services primarily locally though the purchasing teams at our individual Canadian manufacturing locations unless the services, such as information technology related services, are provided by the supplier and received by WestRock Canada on company-wide basis in which case they are managed through the central procurement operations of WestRock Company. Services we hire consist primarily of construction, maintenance, repair (including electrical, plumbing, and piping works), manufacturing, logistics, transportation, warehousing, telecommunications, information technology, recruiting and staffing services, located primarily in Canada. Tier 1 suppliers are categorized as such based on relative procurement spend.

We aim to work with suppliers who share our commitment to conducting business in a sustainable, ethical, legal and socially responsible manner, as guided by the principles outlined in our Supplier Principles of Conduct (as further described below).

## **4 Policies and due diligence processes**

### **4.1 Policies**

WestRock's goal to reduce and prevent the risk of forced labour and child labour in its business and supply chains is underpinned by a number of policies.

As a subsidiary of WestRock Company, WestRock Canada must abide by all WestRock Company global policies.

#### **(a) *Supplier Principles of Conduct***

The Supplier Principles of Conduct, which is referenced in some agreements with our Tier 1 suppliers, states that WestRock Canada expects suppliers to abide by all applicable laws, rules and regulations and to not use forced or child labour in the conduct of their business. It also reiterates WestRock Canada's commitment to conduct business in a sustainable, ethical, legal and socially responsible manner and we request that our suppliers take reasonable measures to ensure that any suppliers from which they source goods or services act in accordance with the Supplier Principles of Conduct and have in place procedures to allow any employee or third party to report violations of the Supplier Principles of Conduct.

In accordance with the Supplier Principles of Conduct, suppliers are expected to allow WestRock Canada or independent third parties acting on its behalf to audit suppliers' compliance with the principles set out therein. If a supplier fails to uphold any aspect of the Supplier Principles of Conduct, the supplier is expected to implement corrective actions to achieve full compliance. WestRock Canada reserves the right to terminate any relationship and agreement with any supplier that cannot demonstrate compliance with the Supplier Principles of Conduct.

**(b) Code of Conduct & Employee Policies**

The WestRock Company Code of Conduct sets out company wide values which guide interactions with customers, suppliers, stakeholders and employees. Among other things, the Code of Conduct governs compensation, anti-corruption practices, political activities, competitive practices, protection of human rights and participation in trade associations. WestRock Company's board of directors reviews and approves the Code of Conduct as updates are made to it.

WestRock Canada has internal policies for its employees, such as the Mutual Respect in the Workplace policy, that help us maintain our commitment to ensuring a safe work environment for our employees. It also communicates our commitment to prohibit child labour and the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

**4.2 Due Diligence Processes**

**(a) Reporting Channels**

WestRock Canada's Compliance Line provides an electronic channel for all to report concerns with respect to violations of applicable laws and regulations, the Code of Conduct or other policies. Concerns of potential violations can be done anonymously by mail, web reporting, email or phone service. Contact information for the compliance line is required to be posted at each WestRock Canada location.

The Supplier Principles of Conduct, which is provided to many of our Tier 1 suppliers, was updated in 2024 to communicate the Supplier Compliance Violation Form, an online tool that may be used to raise any concerns or violations of the Supplier Principles of Conduct, which is also publicly available on our website [here](#).

**(b) Supplier Evaluation and Appraisal**

WestRock Canada, through our centralized procurement and sustainability teams of WestRock Company, continues to work towards the implementation of a Supplier Evaluation and Appraisal process, which aims to evaluate Tier 1 suppliers prior to doing business with us.

Evaluation may take the form of a questionnaire, an interview, or a site visit. It includes appraisals and categorization of various aspects of the risk exposure such as forced and child labour, health and safety, legal compliance, supplier category and country risk and accreditations. Further, it includes a request for suppliers to acknowledge whether they have read and understood our Supplier Principles of Conduct,

or in the alternative, whether they have their own code of conduct in place. Once received, the results of the evaluation are reviewed by procurement and sustainability team managers of WestRock Company. During the Reporting Period, this process was conducted for approximately 100 of 350 Tier 1 suppliers of WestRock Company, several of which are common suppliers to WestRock Canada.

**(c) *Employment Practices***

WestRock Canada is committed to respecting the human rights of our employees by respecting local laws and regulations related to human rights and through our internal employment policies and practices. We strive to implement responsible business conduct in our hiring practices with measures aimed at, among other things, confirming identity and legal working status.

In addition, as outlined in our Mutual Respect in the Workplace Policy, WestRock Canada strives to ensure full compliance with all applicable employment standards and benefits laws. WestRock Company's and WestRock Canada's Human Resources teams are responsible for overseeing our talent hiring, management and compensation strategy, plans, policies and procedures.

**(d) *Compliance Oversight***

Our Enterprise Compliance Committee, Legal Department, Controller, Procurement and Internal Audit groups are responsible for overseeing compliance with legal and regulatory requirements, management's responsibility for assessing and reporting on the effectiveness of internal controls, overseeing effective communication of expectations and identifying and addressing unique compliance risks, including risks of forced labour and child labour, and WestRock Canada's reporting obligations under the Act.

The Audit Committee, as established by WestRock Company's board of directors, may receive periodic briefings on Code of Conduct-related matters and may also be briefed on other specific incidents of non-compliance as appropriate.

**(e) *Supplier Ethical Data Exchange (SEDEX)***

In 2024, we updated our Supplier Principles of Conduct to include a request for suppliers to join SEDEX and we encourage our suppliers to align their sustainability policies and targets with the relevant United Nations Sustainable Development Goals. This measure allows us to gather data on suppliers that have undergone a SMETA audit.

**5 Risks of forced labour and child labour in our business operations and supply chains**

**5.1 Operations**

Given that our primary business operations are conducted in Canada, that the entirety of WestRock Canada's workforce is employed in Canada, that approximately two-thirds of our employees are covered by collective bargaining agreements, and that WestRock Canada has employee policies and procedures in place to help ensure compliance with all applicable laws, we consider the risk of forced labour and

child labour occurring within our business operations to be low. Given that Multi Packaging Solutions International Limited is a holding company and therefore does not have any employees or operations, we do not consider there to be any risk of child or forced labour in connection with the management of its business.

## **5.2 Supply Chains**

During the Reporting Period, WestRock Company began the process of conducting a preliminary assessment of the risks of forced labour and child labour in our supply chains, in which we initiated the mapping of certain of our direct suppliers, including categorizing certain Tier 1 suppliers based on geopolitical risk factors and publicly available data (e.g., Human Freedom Index). We acknowledge that certain manufacturing regions and materials carry a higher risk of forced labour and child labour due to its prevalence in specific countries and industries. However, we have a number of policies and due diligence processes in place in order to mitigate these risks.

As WestRock Canada procures goods from a variety of suppliers, both domestically and internationally, we acknowledge a risk that forced labour and/or child labour may be used in our extended supply chains. Our preliminary risk assessment has involved categorization of some suppliers as higher risk (such as those engaged in cleaning and janitorial services, migrant labour and those in certain regions of Asia-Pacific and South America) and others as lower risk (such as our domestic and North American suppliers).

## **6 Steps taken to assess and manage the risks of forced labour and child labour in our operations and supply chains**

### **6.1 Operations**

WestRock Canada's hiring process requires all new hires to present valid proof of identification and to confirm legal working status and we comply with applicable employment and labour laws in this respect.

### **6.2 Supply Chains**

While WestRock Canada has not completed a formal risk assessment of forced labour and child labour in our supply chains, we have started a risk assessment process by mapping certain of our key direct suppliers, including developing classifications for suppliers in high risk locations and high risk industries. This mapping process has enabled us to begin our assessment of certain forced labour and child labour risks that may exist in our supply chain by virtue of certain supplier's jurisdictions and/or industries of operation. Generally, this process involved working with our suppliers to gather data on our extended supply chains. Where certain tier-two or tier-three suppliers may have been identified as supplying higher risk goods or operating in higher risk locations, we strived to continue working with our suppliers to determine whether these upper-tier suppliers have completed an audit.

Along with beginning this assessment, during the Reporting Period, WestRock Canada continued to work to identify opportunities to strengthen our human rights due diligence practices when evaluating our suppliers.

**(a) Contractual Measures**

We have contracts in place with certain suppliers which contain provisions requesting the supplier to not use forced, involuntary or child labour in its operations and/or a reference to our Supplier Code of Business Conduct.

Some of our standard supplier agreements request that suppliers commit to adhering to the principles and standards in our Supplier Principles of Conduct, which sets out the expectation that suppliers require their own suppliers to commit to similar principles and standards as it relates to forced labour and child labour.

Where we do not have a supplier agreement in place, a purchase order form is completed with these direct suppliers, which references our general terms and conditions accessible on our website [here](#). Our general terms and conditions of purchase sets out the expectation that our suppliers shall not utilize forced labour or child labour and shall demonstrate compliance upon request.

**(b) Supplier Audits**

Our Supplier Principles of Conduct, which is incorporated into some of our agreements with key suppliers, requests for suppliers to join SEDEX, which allows us to gather data on our suppliers. Where certain of these suppliers are located in high risk regions, we aim to request for such suppliers to undergo a third-party audit (for example SMETA) and share the results through SEDEX.

When our customers request to verify our compliance with Human rights laws, WestRock Company will often obtain a third-party SMETA audit to provide the customer feedback on our supply chain processes and risks. Areas identified as lacking compliance would be identified as requiring corrective actions and we would monitor progress of these actions until compliance is achieved. To date, no supplier of services or products identified as carrying a higher risk has impacted the goods, equipment or services used at WestRock Canada.

**(c) Supplier Evaluation and Appraisal**

Through our Supplier Evaluation and Appraisal process, we endeavour to identify aspects of subcontracted services provided to WestRock Company and associated risks. We are aware that the use of migrant labour in the Asia-Pacific region carries a higher risk of forced labour and child labour.

**7 Remediation measures**

There is nothing to report with respect to measures taken during the Reporting Period to remediate (i) instances of any forced labour or child labour, or (ii) the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in our activities and supply chains.

In line with our Mutual Respect in the Workplace policy, if any instances of child labour or forced labour are identified within our operations, WestRock Canada would endeavour to take appropriate remedial

action. In the case where one of our suppliers is found to be non-compliance of our Supplier Principles of Conduct, we expect the supplier to implement corrective action plans to achieve compliance, which may include remediation measures based on the situation, and we may additionally terminate our business relationship with such supplier.

## **8 Training**

During the Reporting Period, WestRock Canada offered mandatory training to all salaried employees on the Code of Conduct. While this training does not directly engage with issues of forced labour and child labour, we engage in comprehension testing and request that our salaried employees confirm that any potential code violations or concerns have been appropriately reported.

The Code of Conduct, related compliance policies, training and support materials are available to all employees in multiple languages on our intranet and copies are provided at the time of onboarding. Further, WestRock Canada managers are provided with training on the Supplier Evaluation and Appraisal process.

## **9 Assessing the effectiveness of our actions**

WestRock Canada is committed to addressing the risks of forced labour and child labour in our business and supply chains. In general terms, our Enterprise Compliance Committee, Legal Department, Controller, Procurement and Internal Audit groups are responsible for overseeing compliance with legal and regulatory requirements, management's responsibility for assessing and reporting on the effectiveness of internal controls and our environmental, social, and governance strategies.

As described in this Report, WestRock Canada is in the process of implementing a number of measures that are aimed to prevent, assess, manage and reduce the risks of forced labour and child labour in our business and supply chains. However, to date, no actions have been taken to formally assess the effectiveness of these measures.

## **10 Approval**

This Report was approved by the board of directors of WestRock Company of Canada Corp. and Multi Packaging Solutions International Limited, respectively, for the financial year ended September 30, 2023 pursuant to subparagraph 11(4)(b)(i) of the Act.

(signatures appear on the next page)



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Steven B. Nickerson

Director

Multi Packaging Solutions International Limited

May 30, 2024

*I have the authority to bind Multi Packaging Solutions International Limited.*

DocuSigned by:



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Dean Jones

Director

WestRock Company of Canada Corp.

May 30, 2024

*I have the authority to bind WestRock Company of Canada Corp.*