



POLICY NAME:	<i>MUTUAL RESPECT IN THE WORKPLACE</i>
DEPT/GROUP:	<i>HUMAN RESOURCES</i>
POLICY SCOPE:	<i>ALL EMPLOYEES</i>
POLICY REGION:	<i>GLOBAL</i>
DATE:	<i>April 1, 2022</i>
OWNER:	<i>CHIEF HUMAN RESOURCES OFFICER</i>

Short Statement: This global policy reflects WestRock’s commitment to respect in our workplaces, including discrimination-free, harassment-free and bullying-free workplaces. This policy also reflects our commitment to accessibility and accommodations and provides information on responsibilities, reporting and investigation and discipline of misconduct under this policy.

Respect in our Global Workplaces

Our WestRock Code of Conduct includes our shared value of Respect -- we treat one another with respect and earn the respect of others through our actions and words. Respect in our workplaces embodies our commitment to diversity and inclusion, teamwork and collaboration, personal dignity, and professionalism. We each share the responsibility to create workplaces that sustain and nurture respect, as follows:

- We treat WestRock colleagues and business partners with dignity and respect.
- We create an environment free from discrimination, harassment and bullying.
- We provide equal opportunity, reasonable accommodation and foster accessibility in our facilities and the work we do.
- We acknowledge one another’s contributions without regard to cultural or physical characteristics or beliefs, and we resolve our differences with respect and professionalism.
- We embrace diversity in our workplace as a valuable asset and source of creativity and innovation.

Workplaces Free from Discrimination and Harassment and Bullying

At WestRock, we are committed to global workplaces free from discrimination. Any employment decision or practice that unlawfully discriminates based on any characteristic protected by applicable law is strictly prohibited. WestRock policy applies to all aspects of

employment, including recruitment, hiring, selection for training, transfer, promotion, discipline and separation.

The types of characteristics protected by law vary across our global locations. Examples of protected characteristics can include, but are not limited to, race, gender, color, national or ethnic origin, religion, age, sexual orientation, gender identity or expression, pregnancy, and disability. Please consult your region, country, state or local policies for additional guidance which may exist specific to your work location.

Harassment-free and Bullying-free

WestRock is committed to providing workplaces free from harassment and bullying. This commitment includes not just conduct inside WestRock's workplaces, but also any work-related conduct that may take place outside of the workplace, such as on business trips, during business meetings and business-related social events and, in some circumstances, conduct unrelated to work, such as conduct that occurs online or on social media, but which has an impact on the workplace. This policy applies to all WestRock employees and to third parties, such as temporary workers, contractors, vendors, customers and third-party service providers performing work for WestRock or at WestRock locations. Whether conduct is offensive or unwelcome is based on the viewpoint of a reasonable person.

Harassment can be a single unwelcome event or an unwelcome pattern of conduct that is based on a characteristic protected by applicable law, the effect of which is to create a work environment that a reasonable person would consider hostile, offensive or intimidating.

Examples of events or conduct that may constitute harassment, singly or in combination, include, but are not limited to, the following:

- Inappropriate physical contact or horseplay;
- Offensive or intimidating comments or gestures or insensitive jokes or pranks;
- Sending or displaying offensive materials;
- Mocking, mimicking or belittling a person or making derogatory or stereotypical remarks based on a protected characteristic; and/or
- Shunning or deliberately excluding someone because of a protected characteristic.

Harassing conduct can come in many forms, such as face-to face interactions, e-mail, social media, texts, documents, message boards, pictures, symbols or objects. People can be harassed even if they are not the intended target. Petty slights, annoyances, and isolated incidents (unless extremely serious) generally will not rise to the level of harassment.

Sexual harassment is unwelcome verbal or physical conduct of a sexual nature which makes the person feel offended, humiliated and/or intimidated. It can include unwelcome sexual advances, requests for sexual favors, including situations where an employee is asked to engage in sexual activity as a term or condition of their employment, as well as situations which interfere with an employee's work performance or create an intimidating, hostile, humiliating or offensive working environment for an employee, or for third parties, including but not limited to temporary workers and contractors.

Examples of conduct that may constitute sexual harassment, singly or in combination, may include, but are not limited to, the following:

- Inappropriate sexual advances, physical contact or physical violence;
- Continued and unwelcome suggestions (verbally, or through gestures or conduct) for dating, romance, social or sexual activity;
- Sexually suggestive comments, offensive jokes, or lewd or offensive horseplay, including as example comments on appearance, or sex life;
- Pornographic, offensive, suggestive, or explicit photographs, pictures or drawings; and/or
- Suggestions or threats that sexual favors or submission to sexual activity may affect one's job, performance evaluation, or working conditions, including as example social invitations for dates or physical intimacy.

Sexual harassment is not confined to male-female interactions. Anyone can be a victim of sexual harassment, and it can include conduct between members of the same sex.

Bullying is repeated, unwanted or abusive conduct that a reasonable person would find hostile, offensive, and unrelated to WestRock's legitimate business interests. Bullying may include, but is not limited to:

- repeated verbal abuse, such as derogatory remarks, insults and epithets;
- verbal or physical conduct that a reasonable person would find threatening, intimidating or humiliating; and/or
- malicious undermining of a person's work performance.

Legitimate, reasonable and constructive feedback of an employee's performance or behavior or a reasonable instruction given to employees during their employment will not amount to bullying or abusive conduct on its own.

Equality of Opportunity, Accessibility and Accommodation

WestRock is committed to providing equality of opportunity for applicants and employees. It is WestRock policy that all employees and applicants otherwise eligible for employment will be evaluated on their individual merit and qualifications for the work to be performed. WestRock policy applies to all aspects of employment, including recruitment, hiring, selection for training, transfer, promotion, discipline and separation. WestRock provides reasonable accommodation/adjustments related to a disability and/or other legally protected status where such accommodation/adjustment enables access to our workplace and/or enables individuals to carry out the essential functions of their jobs and the accommodation/adjustment does not pose an undue burden on the business. Eligibility for accommodations is not contingent on length of service.

The process of identifying an appropriate workplace accommodation/adjustment is fact-based and individualized requiring collaboration and consultation between the employee and the business.

Workplace accommodation/adjustment: If you need an accommodation/adjustment in the workplace related to a disability, religion, and/or other legally protected status, please complete the *Request for Accommodation or Adjustment Form* attached to this policy to begin the interactive review process with your local HR contact (or designee). Third party contractors or vendors should consult their employer to begin this process.

Hiring process accommodation/adjustment: If you believe you need an accommodation/adjustment related to a disability and/or other legally protected status in the application, recruitment or hiring process, please email ada.requests@westrock.com

Diversity and Inclusion

Diverse perspectives encourage different solutions and inclusion encourages ideas. We welcome new ways of thinking and work hard to cultivate an environment where everyone's voice can be heard. Diversity reflects all the ways we are unique and different. At WestRock, it also includes our similarities, as we generally have much more in common than we do differences. Inclusion is fostering an environment in which our co-workers can proudly bring themselves to work every day and it gives them the opportunity to contribute their best. We believe that when we embrace our differences and intentionally include everyone, all our stakeholders – our co-workers, our customers, our suppliers, our investors and the communities where we live and work – have the greatest opportunity to win together to drive superior results and to maximize shareholder value.

Freedom of Association

Where employees are represented by a legally recognized union or works council, we are committed to establishing a constructive dialogue and bargaining in good faith with their freely chosen representatives.

Forced Labor, Human Trafficking and Child Labor

WestRock prohibits the hiring or employment of individuals who are under 18 years of age. To the extent that applicable law is more restrictive, WestRock will comply with local child labor laws.

WestRock prohibits 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.

In the unlikely case that any prohibited labor under this Policy is identified within our operations, WestRock would take immediate remedial action based upon the facts as discovered, and as appropriate for the situation.

Work Hours, Wages and Benefits

WestRock compensates employees competitively relative to the industry and relevant local labor market, as well as the employee's skill, education and experience, and in accordance with the terms of any applicable collective bargaining agreements. We work to ensure full compliance with all applicable wage, work hours, overtime, and benefits laws.

Responsibilities, Reporting and Investigations

Creating a workplace founded on respect requires the active participation of every WestRock employee. We must all be familiar with this policy and we must address or report conduct when we believe in good faith that such conduct violates this policy.

If you observe inappropriate conduct or believe you are being discriminated against, harassed or bullied, you must report that conduct. All reports of discrimination, harassment or bullying will be investigated promptly, and confidentiality will be maintained to the greatest extent possible. If you have concerns for your security or safety related to or arising from discrimination, harassment, bullying or any other circumstance please consult [WestRock's Workplace Violence Policy](#).

Supervisors and managers are held to the highest standards of conduct as leaders within our company because of the trust that is placed in them to direct, manage, coach and support WestRock employees. Supervisors and managers who know of or who are made aware of conduct that may violate this policy must immediately report the conduct to Human Resources, Legal or Compliance, as noted below. Failure to do so may have disciplinary consequences, up to and including termination.

Many instances of misconduct or perceived misconduct under this policy can be resolved respectfully and professionally among WestRock employees through communication, such as by expressing discomfort or by explaining that the conduct is hurtful, belittling or disrespectful. If the conduct does not stop or you are uncomfortable with direct communication for any reason, then you must report the conduct in another manner. Our shared goal is to end any conduct that violates this policy.

WestRock has numerous ways to report conduct that may violate this policy:

- Employees are encouraged to work with local management and HR where appropriate to resolve issues.
- Employees may also contact corporate HR representatives, such as their HR Business Partner, HR Vice President or the Chief Human Resources Officer.
- Employees may also report directly to the legal department or to the Chief Compliance Officer.
- Complaints may also be submitted via the WestRock Compliance Line. Look for the compliance line poster at your location or refer to the WestRock intranet for country-specific, toll-free dialing instructions ([click here to view the compliance line poster](#)). You may also send your concern by email to complianceline@westrock.com, on the web at <https://westrock.alertline.com/gcs/welcome>, or by mail to:

WestRock Compliance Line
Attn: Legal Department
1000 Abernathy Road NE, Suite 125
Atlanta, GA 30028 USA

WestRock will investigate and resolve appropriately all reports of misconduct under this policy.

Retaliation Free Workplace

Retaliation for reporting conduct that may violate this policy or for participating in any investigation under this policy is not tolerated. Retaliation includes any material adverse employment action against an employee because the employee has complained in good faith about or resisted misconduct under this policy, including unlawful harassment, discrimination, bullying or retaliation, or because he or she has cooperated in or assisted with an investigation or in a legal proceeding. Retaliation under this policy can include:

- any action taken to materially adversely impact the terms of conditions of an employee's employment, such as reprimand, transfer, increased scrutiny, or making work more difficult;
- threatening, marginalizing or otherwise generating or exhibiting hostility to another employee because of their involvement in reporting or investigating misconduct; or
- any conduct which has the purpose of discouraging employees from resisting or complaining about conduct they believe in good faith is improper.

Engaging in legally protected activity does not shield an employee from all discipline, including termination. Actions motivated by retaliatory and discriminatory reasons will have consequences.

Discipline for Violations

Failure to abide by this policy may result in discipline up to and including termination of employment. While the laws and customs may vary across our workplaces and geographies, our commitment to respect in our workplace is the same wherever we work. Conduct that does not constitute actionable discrimination, harassment or bullying as those terms are defined by applicable law may still violate this policy and may still result in discipline up to and including termination of employment if the conduct does not comport with WestRock's commitments in this policy.

Other Laws and Regulations

If there is any discrepancy between local labor agreements, works council agreements, local law, regulations, or ordinances, the policy will be interpreted and applied in a manner consistent with those agreements, laws, regulations or ordinances.

This policy does not create a contract of employment nor it is intended to create any contractual rights or obligations. In those jurisdictions where at-will employment is permitted, the terms of this policy will not change or alter the at-will status of any employee's employment with WestRock.

The original language for this policy is English. In the event of any discrepancy between the original language version and any other version, the original language version will govern.

Previous Versions:

May 1, 2021

July 1, 2018



APPENDIX A
COMPLAINT FORM

This form is provided to aid you in submitting a complaint of bullying, discrimination, harassment, and/or retaliation to human resources. *You are not required to use this form to file a complaint.* WestRock will investigate and resolve appropriately all reports of misconduct.

Instructions

Please complete all applicable sections of this form. It is important to be as specific as possible in your complaint so that WestRock may fully investigate the conduct alleged. Please include all information you believe should be considered in an investigation. You are not limited to the space provided. WestRock encourages you to attach any additional materials that may assist us in investigating your claim.

Details of Complaint

Reporting Employee Name: _____ Title: _____ Date: _____

- Identify the individual(s) who experienced the alleged conduct:

- Identify the individual(s) who committed the alleged conduct:

- Has anyone else witnessed the alleged conduct? If yes, please identify those individuals:

- Identify (to the best of your knowledge) when the bullying, discrimination, harassment, and/or retaliation occurred. If it occurred over a period of time or continues to occur, identify that period of time:



- Have you previously reported or complained about the alleged conduct to anyone at WestRock? If so, please identify the person to whom you reported the conduct and the date of the report:

- Describe in detail the facts that form the basis of this complaint (attach additional sheets of paper if necessary):

- Is there any evidence (e.g., documents, emails, videotapes, audiotapes, or other records or materials) we should review? If yes, please identify and describe all such evidence and/or attach it to this complaint:

I acknowledge that I have read and understand the above information. I certify that to the best of my knowledge, the information I have provided is accurate. I understand and acknowledge that a copy of this complaint and any attachments may be viewed by appropriate Company representatives involved in the investigation of this complaint.

Employee Signature

Date



TO BE MAINTAINED IN CONFIDENTIAL MEDICAL FILE

EMPLOYEE REQUEST FOR ACCOMMODATION OR
MODIFICATION OF WORK DUTIES

Name: _____

Date: _____

Work Location: _____

Position: _____

Manager: _____

Best way to reach you by phone: _____

Union: _____ Yes _____ No

Please describe your requested accommodation/modification of work duties:

Why do you need an accommodation/modification of work duties?

For how long or how often will you need this accommodation/modification?

Please provide this form to your local HR office. Your local HR manager will contact you to set up a meeting to discuss this request.