



UK Tax Strategy

Financial year ended 30 September 2023

This is the UK tax strategy for each UK subgroup, UK qualifying company, UK permanent establishment and UK partnership within the WestRock group of companies.

This document is intended to satisfy the reporting obligations of paragraph 19(2) Schedule 19 UK Finance Act 2016.

WestRock partners with our customers to provide differentiated paper and packaging solutions that help them win in the marketplace. WestRock's team members support customers around the world from locations spanning North America, South America, Europe, Asia, and Australia.

Our Core Values – **Integrity**, **Respect**, **Accountability** and **Excellence** – are the foundation of our success and provide a framework for how we do business.

Integrity	Respect	Accountability	Excellence
We are honest, ethical and do the right thing	We treat one another with respect and earn the respect of others through our action.	We are responsible for our work, to our team and for contributing to the success of our company.	We strive to perform at the highest levels—for ourselves and for our customers, investors, and communities.

Consistent with our core values, WestRock is committed to managing our tax policy in a responsible and transparent manner. The overall aim of our tax policy is to reflect and support our business by ensuring a sustainable tax rate, mitigating tax risks in a timely and cost-efficient way, and complying with rules and regulations – and the intent of those rules and regulations – in the jurisdictions in which WestRock operates.

TAX PRINCIPLES

WestRock's tax policy sets out the principles WestRock follows for tax compliance, risk management and governance, and tax strategy and how our Core Values are integrated into our overall approach to the Tax function. Andy Darrington (board member and Senior Accounting Officer) is responsible for the review, approval, and implementation of the policy.

Listed below are additional elements of WestRock's tax strategy affecting UK taxation.

RISK MANAGEMENT AND GOVERNANCE

WestRock recognises that there is inherent risk in worldwide taxation due to (i) the complexities of taxes, (ii) the scope of disagreement over the interpretation of laws, and (iii) the variety and volume of different taxes that affect WestRock's business.

WestRock's board of directors provides oversight of WestRock's risk management process. The board executes its risk oversight function both as a whole and through delegation to its key committees. WestRock's VP Tax is charged with day-to-day management of tax operations and global tax risks. WestRock manages tax risk through prudent and **Accountable** internal control

processes as well as training provided to our teammates. Westrock's controllership team and members of our tax team with responsibility for the UK meet regularly to review tax compliance, strategies, and risks.

WestRock's tax department works with local management to identify and manage UK tax risks using its knowledge of WestRock's operations and UK tax legislation. They do this by, for example, (i) regularly communicating with finance staff to keep informed of any significant business changes, (ii) monitoring proposed changes in UK tax legislation to identify its potential impact on WestRock and (iii) being involved in all acquisitions, mergers, and dispositions, including preparing or reviewing tax diligence reports.

WestRock conducts all business in an honest and ethical manner. We forbid tax evasion and facilitation of tax evasion, whether under UK law (including the Criminal Finances Act 2017) or under the law of any country.

TAX PLANNING

WestRock engages in appropriate tax planning that supports its business and reflects commercial and economic activity. WestRock does not engage in aggressive tax arrangements, the sole purpose of which would be to obtain a tax advantage. WestRock does, however, have a responsibility to minimise its tax risk and potential damage to its reputation and brand.

WestRock strives to comply with all tax rules and regulations on a worldwide basis. WestRock believes it is important to plan its business operations so that WestRock complies with UK and foreign tax obligations. WestRock considers the tax consequences of significant transactions before carrying them out and its tax department decides when to consult external advisors on the tax implications of a potential transaction, with the depth of such advice being driven by the assessment of risk presented by each transaction.

TAX RISK

WestRock seeks to support the business in protecting stockholder value. Within the certain risk parameters and in consideration of WestRock's core value of Integrity, WestRock engages in tax strategy that reflects the economic substance of our business and supports commercial activity. WestRock's primary strategic tax objectives are outlined in the chart below.

STRATEGIC TAX OBJECTIVES	DELIVERY OF THE STRATEGIC TAX OBJECTIVE
1. To avoid unnecessary and time-consuming disputes wherever possible.	This is best achieved by adopting a prudent and recognised position. WestRock forms strong technical positions which are fully supported and compliant with local requirements. Transparency goes beyond the observation of all applicable laws, rules, regulations, and disclosure requirements.
2. Monitor, evaluate, and, when appropriate, pursue incentives made available by governments.	WestRock recognises that we have a duty to stockholders to obtain the most efficient tax expense allowed under tax laws and regulations, when aligned with WestRock's Core Values and social responsibility. WestRock monitors and evaluates opportunities for incentives made available by

	governments and WestRock's ability to claim such incentives. We implement incentives in line with the relevant laws, regulations, and administrative guidelines.
3. Pro-actively partner with the business to provide clear, timely, relevant, and business focused advice across all aspects of tax, real time, on commercial transactions.	WestRock ensures that the business teams understand the objective of the tax functions to minimise exposure to tax risk and how this will be managed and achieved. WestRock considers the tax consequences of significant transactions prior to adoption and implementation.
4. Where alternative routes exist to achieve the same commercial result the most tax efficient approach in compliance with all relevant laws should be considered.	The commercial needs are of the utmost importance and within this context, WestRock seeks to utilise legitimate and recognised tax planning opportunities where they are available and aligned with business substance and purpose.
5. WestRock operates effective tax governance, understanding their tax control framework with a view to continuously adjusting our approach to ensuring compliance with all tax obligations.	WestRock has the resources, governance, processes, and controls necessary to ensure that local tax filings are robustly prepared.
6. Intercompany transactions are based on "arm's length" standard.	WestRock's approach to transfer pricing incorporates the documentation and practice of arms-length intercompany transactions amongst our global companies using established, standard methodologies that effectively achieve the same result as similar transactions with unrelated parties.
7. Professional Excellence	WestRock is committed to hiring and training high calibre professionals and strives to maintain a world class tax organisation. The WestRock Tax Group comprises highly technical CPAs, tax attorneys, tax accountants, tax technology experts, and other tax professionals. Since 2022 WestRock has a tax managed services arrangement with PwC. In the UK specifically, PwC provides for an "end-to-end" solution for Corporation Tax Services. This engagement allows WestRock access to a wealth of expertise and experience within PwC whilst retaining management control and oversight. The WestRock Tax Group also consults external tax advisors, when necessary, to assist with tax matters, including, compliance, potential transaction analyses, and tax incentives.

RELATIONSHIP WITH HER MAJESTY'S REVENUE & CUSTOMS (HMRC)

WestRock seeks to develop constructive, transparent working relationships with HMRC that are founded on **Integrity, Respect, Accountability**, and **Excellence**. WestRock **Respects** and strives to comply with the tax laws and practices of every jurisdiction in which we operate. We aim to always adhere to relevant rules and regulations, including OECD transfer pricing guidelines, when (i) determining our global tax liabilities, (ii) the amount and timing for our tax payments, and (iii) the timing and breadth of disclosures to HMRC. WestRock strives to apply diligent, professional care and judgement that is representative of WestRock's Core Value of **Excellence**.

WestRock has consistently achieved a low-risk rating from HMRC, and it strives to maintain such a rating.

WestRock is committed to the principles of openness and transparency with HMRC and adopts a proactive approach to raising tax issues and working collaboratively with HMRC wherever possible, including seeking clarity over the interpretation of tax law where appropriate.

WestRock seeks to build and sustain relationships with local tax authorities worldwide, including HMRC, that are constructive and based on the principles of cooperation and compliance.

Strategy document reviewed and confirmed on 27 September 2023. The Group has reconsidered the relevance of the published strategy to the current financial year.