UK Tax Strategy

This document is intended to satisfy the reporting obligations of Schedule 19 of the Finance Act 2016.

WestRock's overall tax strategy aims to support its business by maintaining an appropriate tax rate, while mitigating tax risks and complying with the rules and regulations of the jurisdictions in which WestRock operates. WestRock seeks to balance its responsibilities for controlling tax costs with its responsibilities to pay tax where it does business.

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

Risk Management and Governance

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.

While the board and its committees oversee risk management, management of WestRock's operations in the UK is charged with day-to-day management of UK tax risk. WestRock maintains internal policies and procedures to support its tax control framework and provides training to its personnel to manage UK tax risk.

WestRock's Senior Vice President of Tax manages global tax risks for WestRock, except for tax risks associated with Multi Packaging Solutions ("MPS"), a company WestRock acquired, on June 6, 2017. The chief financial officer of MPS will continue to manage MPS's overall tax risks during a reasonable transition period.

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, including preparing or reviewing tax diligence reports.

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 complies 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's tax arrangements are based on its commercial business and economic activities. WestRock recognizes that there is inherent risk related to taxation due to (i) the complexity of taxes, (ii) the scope of disagreement over the interpretation of laws meaning that tax authorities may take a different view of the application of legislation and (iii) the variety and volume of different taxes that affect WestRock's activities. WestRock monitors and reviews its operations in the UK and elsewhere to realign its tax arrangements when necessary to be compliant with the tax rules and regulations.

Tax Strategy

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. 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.
3. 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.
4. WestRock operates effective tax governance, understanding their tax control framework with a view to continuously adjust their approach to achieve compliance with their tax obligations.	WestRock puts in place the resources, governance, processes and controls necessary to ensure that local tax filings are robustly prepared.

Relationship with Her Majesty's Revenue & Customs (HMRC)

WestRock is committed to the principles of openness and transparency with tax authorities and adopts a proactive approach to raising tax issues and working collaboratively with local tax authorities wherever possible.

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