



DS Smith Group Registration, Evaluation and Authorisation of Chemicals (REACH) Policy Statement

Title:	DS Smith Group REACH Policy	Functional area:	Sustainability
Applicability:	Group	Policy owner:	Miles Roberts, Group Chief Executive Officer
Version	1.0	Policy author:	Mark Greenwood, Group Health, Safety and Environment Director
Issue date:	7 March 2017	Status:	APPROVED
File reference:	https://dss365.sharepoint.com/sites/plexus/Divisions/Group/Pages/Chief%20Executive%20statement.aspx	Signature of Approver:	See first page
Page No.	1 of 5	Date Printed	07 March 2017
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This policy outlines our approach to the responsible use of chemicals in our business.

DS Smith recognises it has a responsibility to use chemicals in a safe and environmentally aware manner. Each and every day, the activities of all our colleagues are directed towards delighting our customers, providing a safe and productive work environment for employees, contractors, suppliers, customers or any other visitors to our locations, and ultimately, creating value for our stakeholders.

In order to do this, we set stringent objectives that require all parts of the business to establish legally compliant and safe processes and systems for procuring, storing, handling and disposing of the chemicals that are used in our manufacturing operations. We welcome Regulation EC 1907/2006, regarding the Registration, Evaluation, Authorization and Restriction of Chemicals (The REACH regulations) for providing a legal framework within which to do this.

The REACH regulations are designed to improve the protection of human health and the environment. We are committed to ensuring that our packaging products are safe; this extends to downstream users of our products including the end consumer. Our unique circular business model means that we recognise that our responsibility extends throughout the supply cycle, and we take steps to ensure that no risk is transferred to workers in our customers' factories, consumers, or our colleagues involved in recycling and re-processing our packaging products.

In addition, we take seriously our responsibility to ensure that any chemicals used in our manufacturing processes are deployed in a manner so as to ensure they pose no risk to the environment. We believe that nothing is so important that it cannot be done safely and this is a cornerstone of our vision of a sustainable, profitable business.

This Policy was approved on 7 March 2017.

Miles Roberts

Group Chief Executive

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Page No.	2 of 5	Date Printed	07 March 2017



1. PURPOSE OF THIS POLICY

This document sets out DS Smith Plc's current policy regarding the 'R.E.A.C.H' EC 1907/2006 (Registration, Evaluation, Authorisation and Restriction of Chemicals) legislation and its subsequent amendments (Regulation (EU) No 895/2014) and the process that the Company undertakes to ensure the fulfilment of our obligations.

2. STEPS FOR MANAGING REACH COMPLIANCE

To ensure on-going legal compliance with regulation EC 1907/2006 and subsequent amendments, all personnel involved in the procurement, storage and handling of chemicals for DS Smith Plc shall:

- Monitor the candidate list of substances of very high concern (SVHC) to ensure that additions to the list are evaluated with respect to our products.
- Ensure that any substances appearing on the regulations 'Candidate List' of Substances of Very High Concern (SVHC) are identified and relevant stakeholders are notified where appropriate.
- On an ongoing basis consider the risks of any SVHCs used in products falling within scope of this legislation.

3. MANAGEMENT OF CHEMICALS IN GEOGRAPHIES NOT COVERED BY REACH

Where we operate in geographies that are not covered by REACH regulations, all management and use of chemicals will, as a minimum, comply with all applicable local or national regulations.

4. RESPONSIBILITY FOR THE POLICY

Ultimate responsibility for the compliance with the REACH Regulations rests with the DS Smith Plc's leadership. The Board of Directors of DS Smith Plc has overall responsibility for ensuring this policy is implemented and that we comply with the associated legal and obligations.

Practical responsibility sits within DS Smith's business units, and Managers at all levels are responsible for ensuring those reporting to them:

- understand and comply with this policy; and
- are given adequate and regular training on REACH as required.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

Managers at all levels are responsible for communicating this policy and its requirements as appropriate.

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Page No.	3 of 5	Date Printed	07 March 2017



6. REVIEW

Following its initial adoption, this REACH Policy will be reviewed by the Group's Board of Directors on a regular basis (at least annually) and may be amended from time to time.

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Page No.	4 of 5	Date Printed	07 March 2017

This document is uncontrolled



7. ANNEX

DS Smith plc supports the objectives of REACH (Regulation EC 1907/2006), regarding the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH).

The law entered into force on 1st June 2007 with the specific aim to improve the protection of human health and the environment. It places greater responsibility on industry to manage the risks from chemicals and to provide safety information on the substances. There are three main types of REACH duty holder;

1. Businesses that manufacture or import (from outside the EU) 1 tonne or more of any given substance each year are responsible for 'registering' that substance with the European Chemicals Agency (ECHA). Because substances in articles¹ also count (if these substances are intended to be released during use), it's possible that some manufacturers/importers of such articles will be registrants. The registrant directs downstream users in the appropriate risk management measures for any particular use of the substance and responds to other actors on other aspects of REACH.
2. Business that use chemicals have a duty to use them in a safe way and according to the information on risk management measures that should be passed down the supply chain. Users may need to supply risk assessment and risk management measures to the ECHA if they don't want their supplier to know about how they use the chemicals. Some users may also be importers and have a duty to register.
3. Businesses that sell chemicals have specific duties to pass information down to their customers, and also to pass information back to their own suppliers when customers ask them to do so.

The two main requirements for articles² in the REACH regulation are:

- i. an obligation to register substances that are intentionally released under normal or reasonably foreseeable conditions of use; and
- ii. a notification requirement including certain information obligations in the supply chain, for identified substances of very high concern (SVHC) present in articles in concentrations above 0.1%

Conventional paper, plastic packaging and corrugated board do not contain substances intended to be released, hence only the second requirement is of relevance to DS Smith.

¹ An object which during production is given a special shape, surface or design, which determines its function to a greater degree than does its chemical composition.

² Paper, plastic packaging and corrugated board are articles according to the REACH definitions.

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Page No.	5 of 5	Date Printed	07 March 2017

