



# Global Supplier Standard

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# Our statement to you

Our vision is to be the leading supplier of sustainable packaging solutions. We aim to be a trusted and strategic partner to our customers, providing innovative packaging solutions for all their needs. Our reputation is founded on our commitment to the highest ethical standards in the way we engage with each other, our customers, workers, shareholders, suppliers, and other stakeholders.

We achieve our vision by living **our values** every day. We have developed the Global Supplier Standard (**GSS**) to ensure all our suppliers, agents and business partners across the globe are in alignment with **our values, policies and standards**. The GSS provides clarity to our suppliers regarding our general expectations and requirements in the areas of ethical business practices, social and environmental management.

**You** as a key stakeholder for DS Smith have an important role in fulfilling our vision. Each and every supplier of materials and/or services to DS Smith is expected to meet the same standards that we apply to our own operations. Through compliance with these standards, you help maintain our reputation for excellence, independence and integrity.

These standards define only the minimum requirements for doing business ethically with or on behalf of DS Smith and we encourage you to go above and beyond these minimum requirements.

# Our Fundamental Standards

This section describes the general requirements that all suppliers must comply with in order to sustain any business relationship with DS Smith. These requirements incorporate the [Ethical Trade Initiative \(ETI\) Base Code](#).

## Sourcing and purchasing ethically

DS Smith conducts business activities ethically and with integrity. All suppliers must comply with local laws and regulations and be honest and straightforward with all of their business processes. This means suppliers must deal fairly, responsibly and honestly and ensure these fundamental standards are met. Suppliers must have documentation verifying their ethical sourcing and purchasing activities and may use the Ethical Trading Initiative (ETI) Base Code or any other similar standard as a guideline for implementing ethical sourcing and purchasing. Suppliers must provide this information to DS Smith upon request.

In addition, suppliers of recycled paper for recycling (PfR) shall ensure that such materials are supplied to European Standard EN643. Such materials must have been sourced and moved in accordance with national and international waste legislation.

### All Suppliers must:

1. ensure that employment is freely chosen
2. respect freedom of association, including the right to collective bargaining
3. ensure that working conditions are safe and hygienic
4. ensure that child labour is not used
5. pay at least a legal minimum wage (the minimum national legal standard or industry benchmark, whichever is higher)
6. ensure that working hours are not excessive
7. not practise nor tolerate any form of discrimination
8. ensure that regular employment is provided
9. not tolerate harsh or inhumane treatment
10. respect and protect the environment
11. not practise nor tolerate bribery or corruption
12. promote free and open competition
13. protect confidential information
14. establish grievance procedures
15. respect the rights of indigenous people
16. not permit nor facilitate tax evasion
17. comply with sanctions and embargoes
18. comply with all other applicable laws and regulations

## 1. No Forced Labour

You must prohibit the practice or use of any form of forced labour in your supply chains, including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labour.

We are fully supportive of the UK Modern Slavery Act 2015 and all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force and applicable to you or us. You can access our annual modern slavery statement and read more about our Anti-Slavery and Human Trafficking policy at [DS Smith.com](https://www.ds-smith.com)

You hereby confirm that you comply with the requirements of the UK Modern Slavery Act 2015 and all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force and applicable to suppliers or DS Smith.

You hereby confirm that neither you nor any of your senior officers have been convicted of any offence involving slavery and human trafficking, or been or the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery or human trafficking. If you are unable to provide such confirmation, you will disclose full details of the relevant circumstance to us in writing alongside the signed copy of this GSS.

### Modern slavery and human trafficking occur when workers:

- are forced to work
- are owned or controlled
- are trafficked to workplace for a fee
- have no or limited freedom to leave
- work under very challenging conditions with no recourse
- are punished or constrained physically
- have no working rights
- owe debts to employer or trafficker

## 2. Employees' right to freedom of association and bargaining is respected

It is a fundamental right of employees to have the freedom of association and collective bargaining. You will respect this by providing your employees the right to freely establish or join labour organisations of their choice and freely bargain. This practice should be based on applicable national regulations and laws and internationally recognised labour standards such as the International Labour Organization (ILO).

You will demonstrate good faith and mutual respect in dealings with employees and their representatives (including any employee trade union official) in the workplace.

### 3. Working conditions are safe and hygienic

You will provide a safe and healthy working environment in compliance with all applicable laws and regulations.

You will establish a system or methods to monitor, investigate and report health and safety incidents and performance and implement steps to avoid future accidents.



### 4. Child labour is not used

You will not engage in any form of child labour directly or indirectly (including by the use of sub-contractors).

You will ensure that anyone working for you is at least of minimum age according to applicable national or international law.

### 5. Living wages are paid

You will ensure your wages and benefits meet minimum national legal standard or industry benchmark standards (whichever is higher). In any event, wages should always be enough to meet basic needs and to provide some discretionary income.

You will provide all workers with written and understandable information about their terms and conditions in respect to wages before they start work and about

the particulars of their wages for the pay period concerned each time that they are paid.

You will not permit deduction from wages as a disciplinary measure, nor shall any deduction from wages not provided for by national law be permitted without the express permission of the worker concerned.

### 6. Working hours are not excessive

You will ensure that working hours comply with all national laws, collective agreements and the stipulations of the ETI Base Code.

### 7. No discrimination is practiced

You will not practice or tolerate any form of discrimination.

You are required to establish anti-discrimination and equal opportunities policies and systems to monitor compliance and eradicate any unfair or discriminatory practices throughout your organisation.



You will comply with national anti-discrimination laws and regulations, or in situations where there is no national law present, you will comply with international laws and regulations and adhere to ETI Base Code.

## 8. Regular employment is provided

Work performed must be on the basis of recognised employment relationships established through national law and practice.

Obligations to workers under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, home-working arrangements or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

## 9. No harsh or inhumane treatment is tolerated/ private or public security forces

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation shall be prohibited.

You must not engage with private or public security forces for the protection of a project or your sites, if such security forces engage in torture and cruel, inhuman, or degrading treatment or injure life or limb or violate the right of freedom of association.

## 10. Business is conducted in a manner that respects and protects the environment

From sourcing to delivery, you will conduct business activities in a way that seeks to minimise negative impacts on the environment in accordance with all applicable laws and regulations. You are required



to supply goods and services in a manner that uses resources responsibly, minimising waste and emissions. We encourage suppliers to set Science Based Targets to help reduce the impact of climate change.

You will use water efficiently, conserve water resources where possible and implement strategies aimed at reducing wastewater generation. You agree to adequately classify, continuously monitor and analyse wastewater from operational processes, production procedures and sanitary facilities and, if necessary, to subject it to appropriate treatment to industry standard or legal requirements, whichever is greater, before it is discharged or disposed of.

You will record, monitor and minimise release of air and noise emissions. In the event of excessive issuance, you will take appropriate measures.

DS Smith is working to reduce greenhouse gas emissions across its operations and value chain in line with its 1.5C science-based target. You are expected to take reasonable action to reduce greenhouse gas emissions related to products and services provided to DS Smith and to work with DS Smith to identify opportunities for improvement. You will report annually on your progress (publicly and/or on request). You are also encouraged to set science-based targets by December 2026.

You will identify chemicals or other materials that are hazardous to the environment and adequately treat them to industry standard or legal requirements, whichever is greater, to ensure the safe transport, storage, use, reuse and disposal of these substances.

You will not supply products to DS Smith that contain mercury or mercury compounds, and, if necessary, you will ensure that any mercury waste that is generated is properly processed to industry standard or legal requirements, whichever is greater.

### 11. Eliminating and combating bribery and corruption

You will not, and will ensure that your officers and employees do not, directly or indirectly, either in private business dealings or in dealings with the public sector, offer, promise or give (or agree to offer, promise or give) any financial or other advantage or authorise any such conduct with respect to any matters which are the subject of any agreement between DS Smith and you. You will not obtain, nor offer, promise or agree to obtain, any benefit for DS Smith which would violate any anti-corruption laws applicable to you or DS Smith.

You will, and will ensure that your officers and employees, comply with the UK Bribery Act 2010 and all other anti-corruption and anti-bribery laws applicable to you or DS Smith and will refrain from participating in any corrupt business practices.

For this purpose, the UK Bribery Act 2010 shall be deemed to apply whether or not it is in force and whether or not it applies to the Supplier.

### 12. Promoting free and open competition

We believe in and promote free and open competition. You will not participate in and will prohibit any activities involving anti-competitive agreements,

anti-competitive unilateral conduct that exploits market dominance or market power, cartels, anti-competitive mergers and acquisitions and any other form of anti-competitive activity.

You will comply with all applicable national and international anti-trust and competition laws and regulations.

### 13. Protecting confidential information and technology

You must secure DS Smith's private and confidential information and technology in your possession, use it only as per our instructions and safeguard the confidential information and technology from unapproved or unintended disclosure or unauthorised use. The obligation to safeguard DS Smith's confidential information and technology assets is ongoing and continues even after your business relationship with DS Smith ends.

DS Smith recognises that the correct and lawful treatment of personal data is critical to maintaining business confidence. Protecting the confidentiality and integrity of personal data is a critical responsibility that DS Smith takes seriously.

You will comply with all applicable national and international laws and regulations with respect to the privacy of data relating to individual persons (whether workers or third parties), which you may hold or handle as part of your information processing activities.

You will appropriately secure and protect any machine, Internet of Thing, or computing device you provide, or operate for DS Smith, from cyber or physical threats and attack. Additionally, you will work with DS Smith to ensure appropriate Business Continuity Plans exist.

## 14. Establishing grievance procedures

You will establish formal grievance mechanisms.

This should allow workers to report any grievance that occurs, for example, in connection with employment practices, corruption or human rights.

You will document and report each grievance, the number of grievances reported and the number resolved.

You will record and document procedures followed and/or measures taken to resolve any grievance reported by workers.



## 15. Respect the rights of indigenous people

You must respect the rights of indigenous people and their traditional livelihoods and reject any form of unlawful evictions and expropriations. You must seek free, prior and informed consent of stakeholders affected by resettlement, offer adequate compensation and avoid complicity in forced evictions. You must respect the right to water and other vital resources essential to all stakeholders.

## 16. No tax evasion or facilitation of tax evasion is permitted

We apply a zero-tolerance policy on tax evasion and are committed to preventing the criminal facilitation of tax evasion.

You will not engage in any activity, practice or conduct which would constitute tax evasion or the facilitation of tax evasion, whether under the UK's Criminal Finances Act 2017 or any

other applicable law or regulation with respect to tax evasion or the facilitation of tax evasion. You will cooperate fully with any inquiry made by a tax authority, governmental agency or similar body. You will ensure this commitment is adopted throughout your supply chain.

## 17. Compliance with sanctions and embargoes

You will not, directly or indirectly, source goods and/or services, or any of the raw materials or parts in those goods, or take any other action in connection with, or conduct any business with or on behalf of, DS Smith in contravention of any current economic or trade sanctions, restrictions, embargoes, laws or regulations. This includes any restricted or designated party lists that are imposed, administered or enforced by the United Kingdom, the European Union or any of its Member States, the United States of America, the United Nations, the applicable sanctions authority of any of the foregoing, or any other applicable sanctions authority ("**Sanctions**") or from any person operating, organised or resident in any country or territory that is, or whose government is, the target of comprehensive country-wide or territory-wide Sanctions.

You will notify DS Smith without undue delay if you become aware of any disruption in your business, assets, operations or supply chain which could materially impact your ability to perform your obligations to DS Smith or expose DS Smith to liability as a result of any Sanctions.



## 18. Compliance with this Global Supplier Standard and all other applicable laws and regulations

You will comply with all other laws and regulations applicable to you, related to the goods or services supplied by you to DS Smith.

You are fully accountable for your supply chains and will ensure your supply chains are compliant with all applicable laws and regulations and with obligations equivalent to those set out under this Global Supplier Standard. You agree to provide information or audit access on reasonable request from DS Smith to enable us to verify your compliance with this Global Supplier Standard.

If you become aware of any breach or suspected breach of any of the sections under this Global Supplier Standard or applicable laws, you will promptly notify DS Smith. In such circumstances or if, in the reasonable opinion of DS Smith, you have or may have breached any part of this Global Supplier Standard, and DS Smith may, without liability, immediately suspend or terminate any or all agreements DS Smith has with you by giving you notice, pending an investigation into the breach or suspected breach.

You will assist DS Smith in any such investigation, including the provision of DS Smith access to your personnel, documents, systems and premises.

Notwithstanding anything in any agreement between you and DS Smith, the extent that any section under this Global Supplier Standard imposes obligations on you which are not set out in such agreement, or directly conflicts with any provision of such agreement, this Global Supplier Standard will prevail.

To the extent that there is any conflict between any section under this Global Supplier Standard and local laws and regulations, the higher standard will prevail.

## 19. Speak Up!

If you have a concern about workplace malpractice or unethical conduct this can be submitted via our Speak Up! Channels, where anonymous reporting is also possible:

- Call the 'Speak Up!' hotline on (+44) 0161 532 4712
- Fill out a form on the 'Speak Up!' website: <https://dssmith.integrityline.org/>
- Email DS Smith Plc's Group General Counsel at [AskCoSec@dssmith.com](mailto:AskCoSec@dssmith.com)
- Post a letter to DS Smith Plc's Group General Counsel and Company Secretary, DS Smith Plc, Level 3, 1 Paddington Square, London, W2 1DL
- In some countries there are also additional local reporting 'Speak Up!' channels - further details can be found in the 'Speak Up!' Policy Annex to the 'Speak Up!' Policy

Confidentiality will be maintained throughout the process.

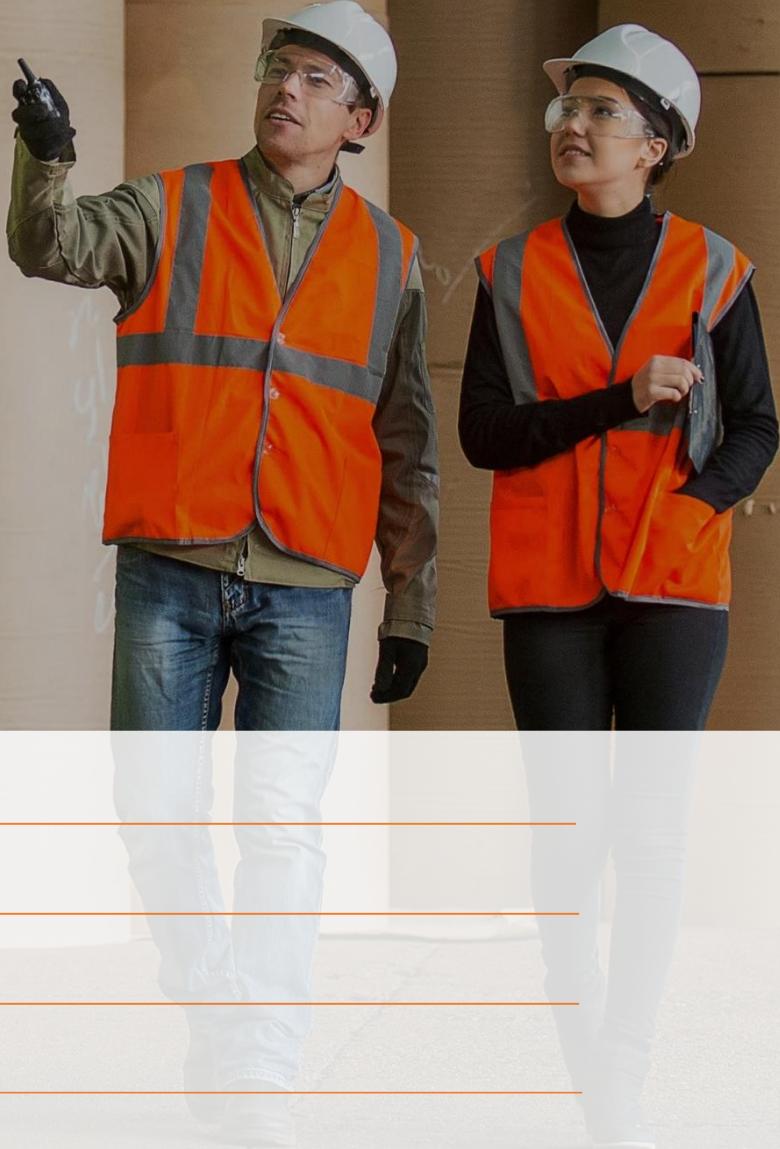
DS Smith guarantees that no attempt will be made to establish the identity of persons who submit anonymous reports, unless there is an improper use of the system.

# Your declaration

## Confirmation of agreement to the DS Smith Global Supplier Standard

The undersigned hereby confirms that the DS Smith Global Supplier Standard (“GSS”) has been received, reviewed and agreed and that you do and will comply with it in full.

By signing this declaration, you agree that DS Smith or their nominated agent or representative may conduct audits on you to verify your compliance with this GSS.



I, the undersigned, am an authorised signatory of \_\_\_\_\_  
(the “Supplier” or “you”) and on the Supplier’s behalf agree that any goods and/or services supplied by you to the DS Smith Group are and will comply in full with this GSS.

Signed: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_