

Code of Conduct

On May 01 2025, the Board of Directors of Smurfit Westrock plc (the “Company”) amended and restated the Company’s Code of Conduct (the “Code”). Certain provisions of the Code were reorganized or reworded to improve clarity and readability. In addition, substantive amendments reflect the following:

- updating the “Reporting Concern” section to include specific ways employees and others can access the Speak Up Service;
- including additional examples of potential conflicts of interest; and
- addition of further details regarding the Company’s Securities and Insider Trading Policy (the “Policy”) in Section 9 “Insider Trading” to align with the final text of the Policy.

The above is only a summary of changes to the Code. Please refer to the full text of the Code, which is available [here](#)