We are committed to striving for the highest standards of corporate governance and ethical business conduct. This commitment is instilled across our business, from the boardroom to the factory floor, and throughout our operations and supply chain.

We believe that ethical business conduct must be promoted at all levels. This is reflected in our approach to governance in terms of sustainable business. We expect the same standards of conduct from our suppliers, and this section also summarises our approach to supplier compliance. For further information on corporate governance, see pages 67-61 of the 2019 Smurfit Kappa Group Annual Report.

Complying with Regulations and Guidelines
The Group’s Code of Business Conduct and Corporate Policies (the Code) applies to the Board of Directors, officers and employees, as well as all individuals, agents or anyone acting on the Group’s behalf. The Code, which was updated in 2019, is available in 17 languages to ensure accessibility and worldwide compliance.

The Code covers a range of topics, including external and internal financial audit, and is subject to the Group’s Annual General Meeting. The Group’s Compliance Officer is responsible for ensuring the Code is implemented and maintained. The Code sets out a framework of principles to guide the Group’s ethical conduct, and it is reviewed annually by the Board and management.

The Code provides a clear set of guidelines for all employees, and it is reviewed regularly to ensure that it is aligned with the Group’s strategy and values. The Code is an important tool for promoting ethical behaviour and ensuring that employees understand their obligations.

The Code also sets out a number of key principles, including:

1. Integrity: We are committed to acting with integrity in all our business activities.
2. Compliance: We are committed to complying with all applicable laws and regulations.
3. Responsibility: We are committed to being accountable for our actions.
4. Sustainability: We are committed to promoting sustainable development and environmental protection.
5. Ethics: We are committed to upholding the highest ethical standards.

In conclusion, the Code of Business Conduct is an essential tool for promoting ethical behaviour and ensuring that employees understand their obligations. It is reviewed annually to ensure that it is aligned with the Group’s strategy and values. The Code is an important tool for promoting ethical behaviour and ensuring that employees understand their obligations.