




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

Title:	DS Smith Group REACH Policy	Functional area:	Health, Safety and Environment
Applicability:	Group	Policy owner:	Miles Roberts, Group Chief Executive Officer
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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 toward delighting our customers, providing a safe and productive work environment for employees, contractors, suppliers, customers or any 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 Regulation") for providing a legal framework within which to do this.

The REACH Regulation is designed to ensure a high level of protection of human health and the environment, as well as the free circulation of substances on the internal market while enhancing competitiveness and innovation. 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 the 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 on our manufacturing processes are deployed in a manner so as to minimise risk to the environment. Where possible, we will work to substitute or eliminate Substances of Very High Concern (SVHCs) from our manufacturing processes. We believe that nothing is so important that it cannot be done safely and this is the cornerstone of our vision of a sustainable, profitable business.

This policy was approved on 07/05/2017.

A handwritten signature in blue ink, appearing to read "Miles Roberts".

Miles Roberts



Group Chief Executive

Purpose of this policy

This document sets out DS Smith Plc's current policy regarding the Regulation EC 1907/2006 on the Registration, Evaluation, Authorization and Restriction of Chemicals as amended ("REACH Regulation"), and the process that the Company undertakes to ensure the fulfilment of its obligations.

1. Steps for managing REACH compliance

To ensure on-going legal compliance with the REACH Regulation all personnel involved in the procurement, storage, handling and use of chemicals for DS Smith Plc shall:

- Monitor the candidate list of Substances of Very High Concern (SVHCs) to ensure that additions to the list are evaluated with respect to our products.
- Ensure that any substances appearing on the candidate list of SVHCs, and in Annex XIV of the REACH Regulation, 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.

2. Identification and review of SVHCs

All DS Smith's operating divisions will undertake regular reviews of chemicals stored and used at their sites. These reviews will identify where, and in what quantity, SVHCs are present, their purpose, whether they are part of the Company's product formulation, and whether they can be substituted or eliminated from the manufacturing process.

Reviews of SVHCs stored on site will be conducted biennially, or on an ad-hoc basis in circumstances where changes are made to the candidate list of SVHCs. Divisional reviews will be reported to the Group Health, Safety and Environment (HSE) function to assess potential risks to the environment, health & safety, product safety and legal compliance. These reviews will be conducted via a survey on the CERTUS system, and the resulting data will inform phase-out plans for any new substances of concern.



3. Substitution and elimination of SVHCs

Where possible, DS Smith will make every effort to substitute or eliminate SVHCs identified in the review process detailed above from its products and manufacturing processes. It is intended that substitution or elimination of these substances will in turn lessen the environmental, health, safety and compliance risks identified by the management of DS Smith Plc.

4. Management of chemicals in geographies not covered by REACH

Where we operate in geographies that are not covered by the REACH Regulation, all management and use of chemicals will comply with all applicable local or national regulations in addition to complying with this policy and the hazardous chemical management standards set by REACH (where these are applicable or possible).

5. Responsibility for the policy

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

Practical responsibility sits within DS Smith's manufacturing sites. HSE Managers at regional and local levels are responsible for ensuring that they, along with all employees reporting to them:

- Understand and comply with this policy;
- Are given adequate and regular training on REACH as required; and
- Complete the biennial SVHCs review in full via CERTUS.

6. Communication and awareness of this policy

The Group HSE function is responsible for communicating this policy and its requirements to HSE Managers, and ensuring that the activities and requirements detailed above are undertaken fully and in a timely manner.

7. Review

Following its initial adoption, this policy will be reviewed on a regular basis (at least biennially) to accommodate changes to the REACH Regulation, new



additions to the Candidate List of SVHCs, and other developments in the area of hazardous chemicals management. Responsibility for this review sits with the Group HSE function.

8. Annex

DS Smith Plc. supports the objectives of 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 hazardous substances. There are three main types of REACH duty holders:

1. Businesses that manufacture or import (from outside the EEA) 1 tonne or more of any given substance annually are responsible for 'registering' that substance with the European Chemicals Agency (ECHA). Because substances in articles¹ are also regulated (if these substances are intended to be released during use), it is possible that some manufacturers/importers of such articles will be registrants. The registrant directs downstream users in the appropriate risk management measures (via safety data sheets) for any particular use of the substance and responds to other actors in the supply chain on other aspects of REACH.
2. Businesses 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 do not 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 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 SVHCs present in articles in concentrations above 0.1% weight by weight.

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 and corrugated board are articles according to REACH definitions.



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