

DS Smith Group Conflict Minerals Policy

Title:	DS Smith Group Conflict Minerals Policy	Functional area:	Sustainability
Applicability:	Group, External	Policy owner:	Emma Ciechan
Issue date:	26 th March 2019	Policy author:	Andy Lewis
Status:	v0.3	Signature:	<i>Emma Ciechan</i>



Context

Introduction to issue

'Conflict Minerals', as defined by US legislation, refers to minerals or other derivatives (specifically, Tin, Tantalum, Tungsten, and Gold, also known as 3TG) mined predominantly in the eastern provinces of the Democratic Republic of the Congo (DRC) and in the adjoining countries where the revenues of the 3TG minerals may be directly or indirectly financing armed groups engaged in civil war resulting in serious human rights and environmental abuses.

Materiality to DS Smith

At DS Smith, we comply with the principles of good corporate governance and understand the importance of being trusted by our stakeholders to operate in an ethical manner. Our primary products, paper and packaging, do not require the sourcing of 3TG minerals; however some of our specialist operations, such as machinery production, source a small quantity of these minerals in the form of electrical components. Therefore, managing our obligations in relation to conflict minerals is an essential part of our corporate governance and managing our supply chain responsibly.

Scope

This policy is relevant to the whole DS Smith Group.

Our target(s) and commitments

DS Smith will work to ensure that none of our products contain conflict minerals that have been sourced from mines that directly or indirectly support or fund conflict within the DRC or adjoining countries.

We are committed to:

- identifying which DS Smith products are currently at risk and targeting our efforts accordingly.
- working with our current suppliers to ensure that any 3TG minerals contained in the products and materials supplied to DS Smith originate from Conflict Free sources, preferably via Conflict-Free Sourcing Initiative (CFSI) certified smelters.
- not knowingly purchasing any products, components and materials containing conflict minerals.

Our management approach

At DS Smith the responsibility for our sustainability performance is governed at the highest levels in line with our strategic goal to "lead the way in sustainability."

The Group Chief Executive is ultimately responsible for the management of all sustainability-related topics. Management of individual topics is done within the appropriate divisional and functional teams with oversight by both the monthly Health, Safety, Environment and Sustainability Committee and tri-annually by the Sustainability Steering Group. All of the above are supported by the Core Sustainability



Team which focuses on providing insight and knowledge, specialist project support and delivery, and data and reporting services.

In working towards our commitments, we have already taken a number of steps that include:

- All suppliers of components containing 3TG minerals must implement a conflict minerals policy and exercise appropriate due diligence to investigate the source of these minerals in their own supply chain.
- DS Smith will engage with these suppliers so that they respond in a timely manner to our requests for evidence of compliance. In the future, our suppliers' willingness to comply with this initiative will be a factor in our sourcing decisions.
- We will educate and closely support suppliers who are working towards compliance with the above commitments, however if suppliers disregard our commitments, we will be forced to take strong actions which may include ending our relationship with those suppliers."

Supporting documents

- [Global Supplier Standards \(GSS\)](#)

Review

We will review this policy annually.