

# Sustainability Report 2025





**“Together, we will be a diligent steward of our forests, a responsible custodian of our environment and a force for good in our communities.”**

**Tim Nicholls**  
Executive Vice President and President of DS Smith, an International Paper company.

# Introduction

**At DS Smith, sustainability is integral to our circular business model, and we can have the greatest positive impact by helping to create a low carbon, circular economy. It’s a journey we have been on with customers and colleagues for more than a decade.**

On 31 January 2025, we joined the International Paper family, creating a global leader in sustainable packaging solutions, focused on the attractive North American and Europe, the Middle East and Africa (EMEA) regions. Together we remain committed to creating a more sustainable future.

You’ll notice the 2025 Sustainability Report is more concise, focusing on specific progress and key highlights from the year. While the report may appear different, our dedication to designing out waste and pollution, decarbonising our operations and value chain, protecting and regenerating nature and creating a safe, diverse and inclusive workplace remains unchanged.

We are proud of the progress we have made to date in partnership with our customers, suppliers and communities. In the reporting period, we reduced our greenhouse gas emissions across all three scopes by 2 per cent compared to 2023/24, replaced, avoided or reduced a cumulative total of over 1.7 billion pieces of plastic since 2020/21, implemented water management plans at 100 per cent of our paper mills and packaging sites and had a 10 per cent reduction in the total number of accidents compared to the previous reporting period.

Looking ahead, we are pleased to be part of the International Paper family. It’s important to note DS Smith’s 2025 Sustainability Report does not include data from International Paper. This acquisition marks a new chapter for us, and in 2025, we plan to analyse and consolidate our sustainability data and roadmaps and develop a new framework and targets that reflects our current and future identity.

**Tim Nicholls**  
Executive Vice President and President of DS Smith, an International Paper company.



**“Sustainability is a core strength of the newly combined company, and we are dedicated to addressing the sustainability challenges we all face today, as well as those that will impact future generations.”**

**Sophie Beckham**  
Chief Sustainability Officer at International Paper

This Sustainability Report reflects the operations, performance and sustainability-related activities of DS Smith Plc prior to its acquisition by International Paper Company, which was completed on 31 January 2025. Following the acquisition, DS Smith was delisted from the London Stock Exchange on 4 February 2025 and has since been registered as DS Smith Limited, a private limited company effective on 5 February 2025. This Sustainability Report is based on the legacy company’s structure, data systems, reporting and policy framework, including its governance structure and approach to diversity, equity, and inclusion. References to DEI initiatives, commitments, and metrics reflect the practices established by DS Smith Plc before the acquisition. These legacy efforts may evolve as DS Smith Limited integrates into International Paper Company’s broader corporate policies and sustainability strategy. Future disclosures will reflect any modifications, enhancements, or alignment of principles within International Paper Company’s governance framework.

Contents

4	Now & Next
6	Now & Next progress
8	Environment
27	Social
37	Governance & Appendices
46	GRI
47	SASB
48	Glossary

ESG Reporting Hub

➔

Reporting period, scope and independent assurance

This report covers our 2024/25 period, which is from 1 May 2024 – 30 April 2025.

All of our packaging plants, paper mills and recycling depots are part of Now & Next, our Group-wide Sustainability Strategy. The Basis of Preparation, available from our online ESG Reporting Hub, includes a detailed methodology for how our ESG reporting is prepared.

Deloitte have provided independent assurance over selected information, identified with \* across the metrics and targets pages within each section. A summary assurance statement can be found on page 45 and the full assurance report can be obtained from our DS Smith ESG Reporting Hub.


ESG ratings

We participate in reputable environmental, social and governance ratings that our customers and investors value as an independent indicator of sustainability performance.


We continued to perform well in 2024/25, joining the 2 per cent of the 22,700 companies scored on CDP's 'A List'.

In 2024/25, we achieved Platinum status in the EcoVadis rating, placing us among the top 1 per cent of companies globally.


We were also delighted to have been included in the S&P Global Sustainability Yearbook 2025.



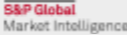
CDP Climate Change A-  
CDP Forests A  
CDP Water Security A-




EcoVadis Platinum



MSCI A



S&P Global 72



Sustainalytics 'Low Risk'

Alignment with international frameworks

We respect several international frameworks that are relevant to corporate responsibility and ethical business conduct, including:

- United Nations Declaration of Human Rights and the Convention on the Rights of the Child
- International Labour Organization (ILO) Eight Fundamental Conventions
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- United Nations Global Compact (UNGC)
- United Nations Sustainable Development Goals (SDGs)

Circularity



“Our focus remains on driving plastic reduction, waste to landfill reduction and recyclable solutions with our customers through our Circular Design Metrics.”

**Patricia Oddshammar**  
Chair of Steering Group

➔ See pages 22-26

**Designing out waste and pollution, and keeping materials in use**

During the reporting period, we continued to replace, avoid or reduce plastics, achieving 1.7 billion cumulatively since 2020/21. We also continue to use our Circular Design Metrics and our designers have created over 58,000 solutions for customers throughout the reporting period.

Carbon



“We continue to focus on Scope 1, 2 and 3 reductions to achieve our aim of decarbonising our operations and value chain.”

**Nick Furmston**  
Chair of Steering Group

➔ See pages 9-13

**Decarbonising our operations and value chain**

In the reporting period, we continued to focus on the decarbonisation roadmap, delivering several projects and initiatives including energy deep dives at several sites. We continued to engage strategic suppliers, with c. 47 per cent of our purchased goods and services emissions generated by strategic suppliers either with, or in the process of setting, a science-based target.

People & Communities



“Health and safety and driving diversity, equity and inclusion across our sites and offices has remained our focus during the reporting period.”

**Paul Adams**  
Chair of Steering Group

➔ See pages 27-36

**Creating a safe, diverse and inclusive workplace and being active in our communities**

We continued to strengthen our human rights due diligence in the reporting period, with Sedex SAQ rolled out to 100 per cent of our manufacturing sites. Health and safety continues to be a top priority, with 263 sites with zero accidents in the reporting period.

Nature



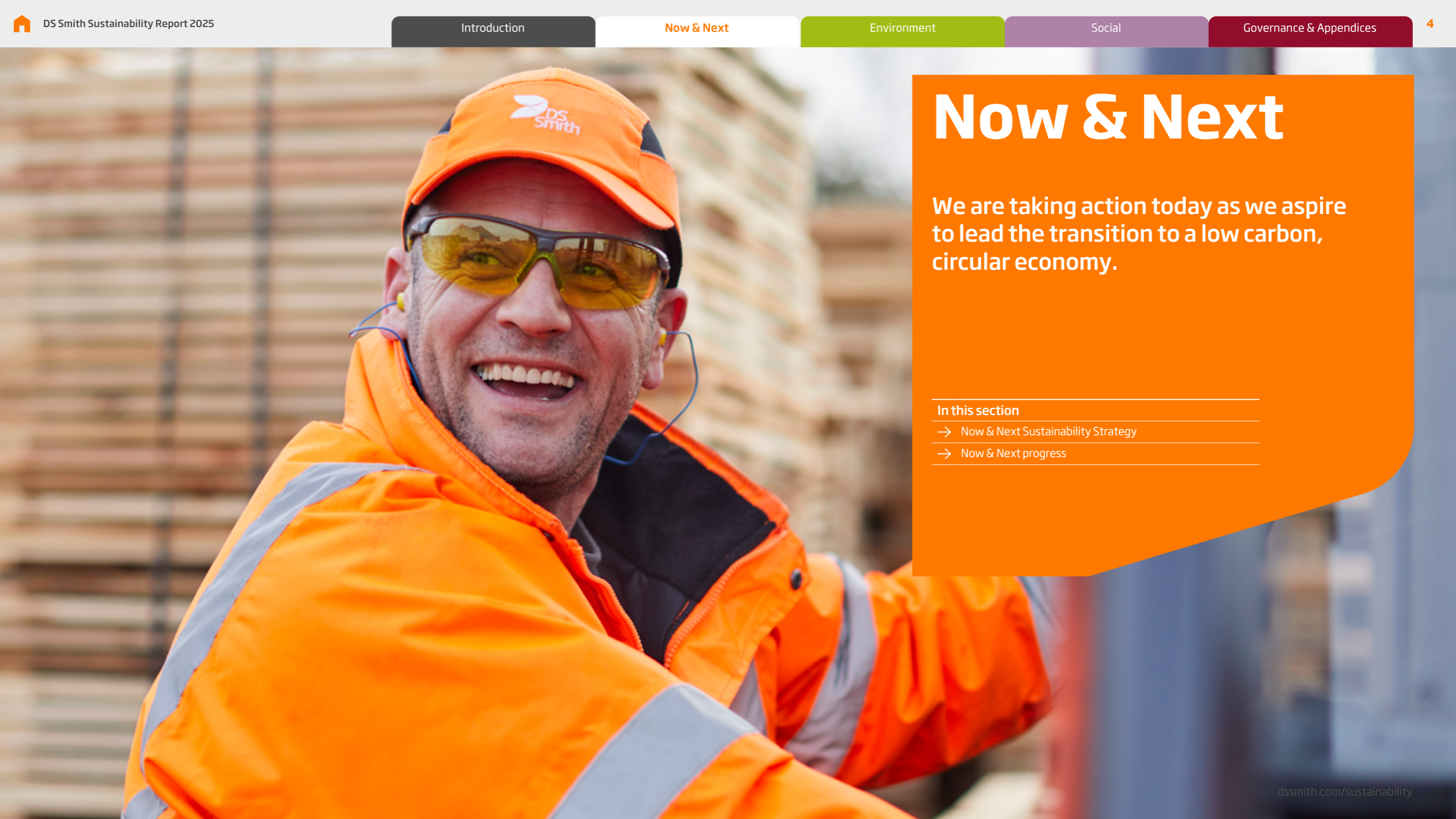
“Our focus remains protecting the forests, nature and biodiversity our business relies on, whilst preparing for regulation and continuing our combination with International Paper.”

**Tom Hollick**  
Chair of Steering Group

➔ See pages 14-21

**Protecting and regenerating nature**

During the reporting period we continued to focus on European Union Deforestation regulation (EUDR) compliance alongside delivering on our Now & Next targets and preparing for our future with International Paper.



# Now & Next

We are taking action today as we aspire to lead the transition to a low carbon, circular economy.

---

## In this section

- Now & Next Sustainability Strategy
  - Now & Next progress
-



# Now & Next Sustainability Strategy

The Now & Next Sustainability Strategy includes ambitions for 'Now' and for 'Next', focusing on the sustainability challenges we are facing today. As can be seen in this section, a number of milestones under Now & Next were met on target and in full in the reporting period.

Looking ahead, we are pleased to join the International Paper family. This acquisition marks a new chapter for us, and in 2025, we plan to analyse and consolidate our sustainability data and roadmaps and develop a new framework that reflects our current and future identity.

Sustainability is a core strength of the newly combined company, and we are dedicated to addressing the sustainability challenges we all face today, as well as those that will impact future generations.

It's important to note DS Smith's 2025 Sustainability Report does not include data from International Paper.




See International Paper and DS Smith Combination for more information



# Now & Next progress

Circularity

	24/25	23/24	22/23		Status
Design out waste and pollution					
By 2025, optimise fibre for individual supply chains in 100 per cent of new packaging solutions <sup>2</sup> Metric: Percentage of fibre use optimised for individual supply chains	96.1%	90%	64%		Not achieved <sup>1</sup>
By 2030, optimise every fibre for every supply chain	Ongoing	Ongoing	Ongoing	✓	On track
By 2025, help our customers to replace one billion pieces of plastic with alternative fibre-based solutions Metric: Number of pieces of plastic replaced	Over 1.7 billion cumulative since 2020/21			🏆	Achieved
By 2030, send zero waste to landfill Metric: Total waste landfilled (tonnes)	164,840 tonnes	165,840 tonnes	204,637 tonnes	✓	On track
Keep materials in circulation					
By 2025, test up to five reuse pilots and continue to manufacture 100 per cent recyclable and reusable packaging	5	Ongoing	Ongoing	🏆	Achieved
By 2030, aim for all our packaging to be recycled or reused <sup>3</sup>	Ongoing	Ongoing	Ongoing	✓	On track



**Contributes to United Nations Sustainable Development Goal (SDG):**  
Achieving these targets helps us to keep materials in use for longer, reduce waste and pollution and protect natural resources

1. We fell short of our 100% target as in some instances supply chain data or information surrounding actual packaging use was not available due to commercial sensitives or complex supply chains, limiting our ability to fully optimise fibre in solution design.

2. This figure represents c. 77 of our conventional packaging sites for which BSIR (Board Strength Index Requirement) data is available. It does not capture all packaging designs and specifications and excludes board purchased externally and sheet board sales. See page 22 for more information.


3. In 2024/25, 99.6 per cent (2023/24: 99.6 per cent) of our packaging volume met our 100 per cent recyclable and reusable standard. For the remaining 0.4 per cent volume that is presently not either recyclable in practice or at scale, such as some barrier coatings and foam, we continue to push for alternatives.

4. DS Smith commits to reduce absolute Scope 1, 2 and 3 GHG emissions 46.2 per cent by FY 2030 from a FY 2019 base year.


5. DS Smith commits that 76 per cent of its suppliers by emissions covering purchased goods and services will have science-based targets by FY 2027.

Carbon

	24/25	23/24	22/23		Status
Decarbonise our operations and value chain					
By 2030, reduce Scope 1, 2 and 3 GHG emissions by 46 per cent compared to 2019 <sup>4</sup> Metric: Total GHG emissions (tonnes CO <sub>2</sub> e)	6,831,529 tonnes CO <sub>2</sub> e	6,985,269 tonnes CO <sub>2</sub> e	7,391,418 tonnes CO <sub>2</sub> e	✓	On track
By 2027, encourage 100 per cent of our strategic suppliers (representing 76 per cent of purchased goods and services emissions) to set their own science-based targets <sup>5</sup> Metric: Percentage of purchased goods and services emissions from suppliers with science-based targets	47%	42%	32%	✓	On track
By 2050, reach Net Zero GHG emissions	Ongoing	Ongoing	Ongoing	✓	On track

**Contributes to United Nations Sustainable Development Goal (SDG):**  
Achieving these targets helps us to reduce our emissions to combat climate change and its impacts




See our Basis of Preparation, available online from the DS Smith ESG Reporting Hub, for full methodology notes.




# Now & Next progress *continued*



## People & Communities





	24/25	23/24	22/23		Status
<b>Engaged people and communities</b>					
By 2025 <sup>2</sup> , engage 100 per cent of our people on the circular economy Metric: Percentage of our people engaged on the circular economy	96%	76%	57%	✓	On track
By 2030, engage 10 million people on the circular economy and circular lifestyles	15.4 million cumulative since 20/21				Achieved
100 per cent of our sites <sup>1</sup> engaged in community activities each year Metric: Percentage of sites participating in community activities	100%	100%	100%		Achieved
<b>A safe and inclusive workplace</b>					
Reduce the Accident Frequency Rate (AFR) every year	1.73	1.65	1.82	✓	On track
Strive to achieve Vision Zero	Ongoing	Ongoing	Ongoing	✓	On track
By 2025 <sup>2</sup> , inclusive leadership workshops completed by all leadership teams across all sites	72%	25%	New target	✓	On track
By 2030, improve gender diversity towards 40 per cent women in senior leadership <sup>3</sup> and set an aspiration for other protected characteristics	29.9% <sup>4</sup>	31.1%	34.5%	✓	On track
<b>Respect human rights</b>					
By 2025, complete Sedex SAQ roll out to all sites and perform appropriate auditing of SAQs <sup>5</sup>	100%	100%	56%		Achieved
Continue to improve human rights due diligence each year	Ongoing	Ongoing	Ongoing	✓	On track




**Contributes to United Nations Sustainable Development Goal (SDG):**  
Achieving these targets helps us to be a responsible employer, with high ethical, labour and employment standards



## Nature

	24/25	23/24	22/23		Status
<b>Protect and regenerate forests and biodiversity</b>					
By 2025, measure and improve biodiversity in our own forests and assess our dependencies on nature	Complete	Ongoing	Ongoing		Achieved
By 2025, biodiversity programmes in place at each of our paper mills Metric: Number of our paper mills with biodiversity programmes in place	14	14	13		Achieved
Set targets to regenerate nature taking a science-based approach	Ongoing	Ongoing	New target	✓	On track
<b>Water management</b>					
By 2025, 100 per cent of our paper mills and packaging sites to have water management plans <sup>6</sup> Metric: Percentage of sites with water management plans	100%	10%	New target		Achieved
By 2030, 10 per cent reduction in water withdrawal per tonne of production at mills at risk of water stress compared to 2019 Metric: Water abstracted for use in own process (per metric tonne of net saleable production) (m3/t nsp)	7.59 m³/t nsp	7.52 m³/t nsp	8.4m³/t nsp		Achieved



**Contributes to United Nations Sustainable Development Goal (SDG):**  
Achieving these targets helps us to protect and restore ecosystems

1. Sites with greater than 50 full-time employees.

2. 31 December 2025.

3. Defined in accordance with the requirements of the FTSE Women Leaders Review as those on our four Executive Committees and their direct reports.

4. Percentage as at 31 October 2024.

5. The Sedex SAQ (Supplier Ethical Data Exchange Self-Assessment Questionnaire) is a set of questions relating to business practices, management systems, policies and worker information. The scope includes manufacturing sites and the 100 per cent figure refers to the SEDEX SAQ roll out.

6. Sites in scope include manufacturing sites with > 5,000m³ annual water withdrawal, identified at current or future water stress risk with the WRI Aqueduct Tool.



# Environment

We aim to reduce our Scope 1, 2 and 3 GHG emissions by 46 per cent by 2030 for our science-based target.

We continue to protect nature, assessing and supporting biodiversity and managing water responsibly.

We aim for all our packaging to be recycled or reused and zero waste to be sent to landfill.

---

## In this section

- Climate change
  - Water and marine resources
  - Biodiversity and ecosystems
  - Resource use and circular economy
-



# Environment

## Climate change

# Decarbonising our operations and value chain

**Carbon is one of the four focus areas of the Now & Next Sustainability Strategy, with the objective of decarbonising our operations and our value chain. Our Now & Next targets focus on reducing our Scope 1, 2 and 3 greenhouse gas (GHG) emissions and decarbonisation projects.**

**We work with our strategic suppliers and encourage them to set their own science-based targets, including introducing them to Supplier Leadership on Climate Transition (Supplier LoCT).**

## Reach Net Zero by 2050

The transition to Net Zero and a circular economy will not happen overnight, nor will it be delivered by any given company operating in isolation. In support of a 1.5°C Net Zero economy, we are committed to considering the Paris Agreement in our activities, including in our external engagement, as underpinned by the IPCC Sixth Assessment Report (AR6) and the IPCC Special Report on Global Warming of 1.5°C (SR1.5).

We continue to engage and provide feedback to the Science Based Targets initiative (SBTi) Net Zero standard revision consultation, and in parallel, we are monitoring the finalisation of the forestry pathway in the FLAG (Forest, Land and Agriculture) emissions reduction standard.

As climate target frameworks evolve, and high-quality natural and technological climate solutions develop, we will identify a robust and transparent path towards a net zero future.

## Reducing Scope 1, 2 and 3 emissions

To limit global temperature increases to 1.5°C in line with the Paris Agreement we must all reduce emissions rapidly. In a low carbon, circular economy, emissions can be reduced by improving energy efficiency, investing in new technologies and switching to renewable energy solutions.

During the reporting period, GHG emissions across all three scopes totalled 6,831,529 tonnes CO<sub>2</sub>e (2023/24: 6,985,269 tonnes CO<sub>2</sub>e), which is a 2 per cent reduction compared to last year and a 21 per cent compared to the base year (2019/20: 8,645,693 tonnes CO<sub>2</sub>e).

These results were achieved through our decarbonisation roadmap for our paper mills and packaging plants, optimising for best cost solutions and carrying out assessments relating to future decarbonisation projects.

During the reporting period, Rouen paper mill transitioned from a coal-fired boiler to natural gas, with further plans to transition to a new biomass boiler. It is anticipated that the boiler will be fuelled by c. 30 per cent by-products (pulper waste) and c. 70 per cent waste wood (e.g. furniture and demolition waste). By 2025/26, this aims to reduce emissions by c. 99,000 tonnes.

We completed energy deep dives at 12 packaging sites and two paper mills during the reporting period. The next stage of the deep dives is the development of energy deep dive training course, delivered in three training sessions. This course will support the business in identifying energy efficiency projects and drive improvement in the business.

We have been working to improve air compressor efficiency and eliminating air leaks and in Zarnesti we have saved c. €90,000 over 12 months by eliminating air leaks.

We also delivered an energy switch off campaign and trialled new technology, including electric motors and starch pumps.

## Decarbonising our value chain

Throughout the reporting period, our cross-functional Scope 3 working group has continued to develop our understanding of our value chain emissions. Improvements, such as utilising CDP (2024) sector-average emission factors, reflecting CDP-reviewed data for thousands of respondents backed by a robust and transparent methodology, have helped us to improve the accuracy of our methodology in reporting the performance of our suppliers.

We engage our strategic suppliers to set science-based targets, deploying bespoke engagement mechanisms depending on supplier maturity. These are based on our Now & Next target by 2027 to encourage 100 per cent of our strategic suppliers to set their own science-based targets. During the reporting period, we estimate that 47 per cent of our Scope 3 Category 1 (Purchased Goods and Services) emissions were generated by strategic suppliers who have set, or are in the process of setting, their own science-based target (2023/24: 42 per cent).

We prioritise 'strategic suppliers', which we define as the suppliers with whom we hold a long-term, mutually cooperative relationship with mutual commitment, where significant and ongoing value is accrued to both parties through operational capabilities. We typically have a strong relationship with these suppliers, meaning we have a great degree of leverage to influence actions.

During the reporting period, we engaged with 67 suppliers as a member of the CDP Supply Chain programme, enabling us to collect data to measure the progress made in our supply chain. We continue to engage with less mature suppliers through the Supplier Leadership on Climate Transition initiative, founded by some of our key customers. This encourages them to calculate their carbon footprint, set a science-based target and begin reducing their own emissions.

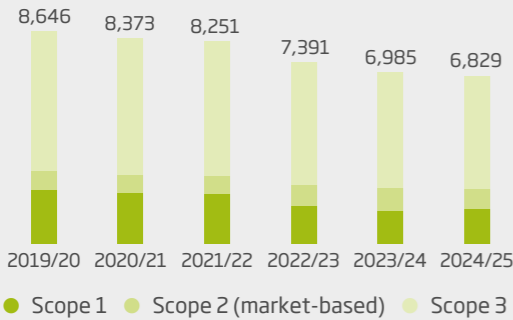
In addition to requiring that our suppliers adhere to our Global Supplier Standards, we continue to assess the sustainability practices of our suppliers annually, using EcoVadis. In line with our Supplier Management Policy, we aim to retrain and engage suppliers in instances where the engagement does not lead to desired changes. In extreme cases, non-adherence can result in exiting a relationship with a supplier.

### In this section

- Decarbonising our operations and value chain
- Metrics

# Climate change metrics

Group greenhouse gas (GHG) emissions split by Scope (Kt CO<sub>2</sub>e)



## Group greenhouse gas (GHG) emissions

Metric	Unit of measure	2024/25	2023/24	2019/20 (base year)	Compared to last year	Compared to base year
Direct (Scope 1) GHG emissions	tonnes CO <sub>2</sub> e	1,399,949*	1,340,272*	2,181,890	4%	-36%
Indirect (Scope 2 market-based) GHG emissions	tonnes CO <sub>2</sub> e	840,913*	944,921*	792,275	-11%	6%
Indirect (Scope 2 location-based) GHG emissions	tonnes CO <sub>2</sub> e	840,841*	922,923*	875,544	-9%	-4%
Indirect (Scope 3) GHG emissions	tonnes CO <sub>2</sub> e	4,587,940	4,700,076	5,671,528	-2%	-19%
Total GHG emissions	tonnes CO <sub>2</sub> e	6,828,801	6,985,270	8,645,693	-2%	-21%
Gross Scope 1 and 2 (market-based) GHG emissions	tonnes CO <sub>2</sub> e	2,240,861*	2,285,193*	2,974,165	-2%	-25%
GHG emissions from energy export	tonnes CO <sub>2</sub> e	566,254*	488,604*	791,810	16%	-28%
Net Scope 1 and 2 (market-based) GHG emissions	tonnes CO <sub>2</sub> e	1,674,607*	1,796,589*	2,182,355	-7%	-23%
Energy consumption	MWh	14,258,793*	14,058,435*	15,707,667	1%	-9%
Energy exported	MWh	1,550,598*	1,525,376*	1,977,616	2%	-22%
Total production	tonnes	9,871,434*	9,874,853*	10,222,065	0%	-3%
GHG emissions per tonne of production	kg CO <sub>2</sub> e /t nsp	170*	182*	213	-7%	-20%
Out of Scope GHG emissions	tonnes CO <sub>2</sub> e	1,039,351*	1,022,400*	552,789	2%	88%

### Methodology

Greenhouse gas emissions are reported in accordance with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard (Revised), under a financial control boundary.

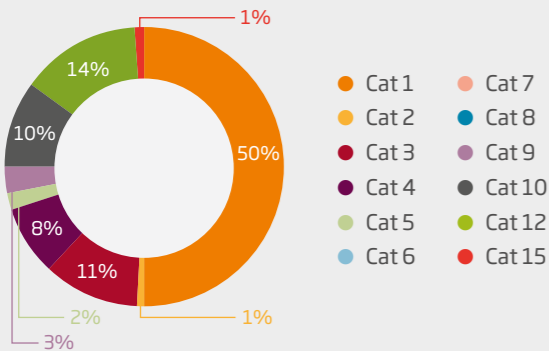
Department for Business, Energy & Industrial Strategy (BEIS) 2022 emission factors are applied, unless emission factors from other sources are deemed more appropriate.

For more information, see our Basis of Preparation, available from our ESG Reporting Hub.

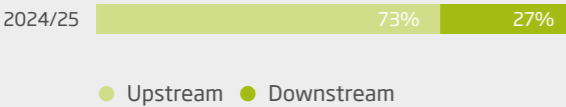
\* Independent Assurance has been obtained for metrics marked ‘\*’, see the summary statement on page 45. Independent third-party limited assurance of selected information for the 2019/20 base year was provided by Bureau Veritas. All full assurance statements can be found on our ESG Reporting Hub, at <https://www.dssmith.com/sustainability/reporting-hub>.

# Climate change metrics *continued*

Scope 3 GHG emissions breakdown by category (2024/25) (%)



Upstream and downstream Scope 3 GHG emissions (2024/25) (%)



## Scope 3 greenhouse gas (GHG) emissions

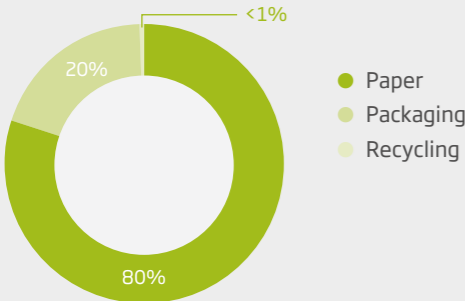
Scope 3 category	Unit of measure	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Category 1: Purchased goods and services	tonnes CO <sub>2</sub> e	2,301,052	2,233,164	2,341,614	2,477,300	2,480,272	2,562,626
Category 2: Capital goods	tonnes CO <sub>2</sub> e	61,614	141,634	161,217	86,304	90,017	96,891
Category 3: Fuel and energy-related emissions	tonnes CO <sub>2</sub> e	477,282*	480,239*	471,063	500,446	494,324	425,243
Category 4: Upstream transportation and distribution	tonnes CO <sub>2</sub> e	372,631	363,900	377,052	425,362	474,224	407,883
Category 5: Waste generated in operations	tonnes CO <sub>2</sub> e	108,231*	101,192*	119,671*	218,444	231,287	252,834
Category 6: Business travel	tonnes CO <sub>2</sub> e	3,904	3,102	3,912	1,487	381	4,173
Category 7: Employee commuting	tonnes CO <sub>2</sub> e	4,936	4,903	5,390	6,062	4,880	7,992
Category 8: Upstream leased assets	tonnes CO <sub>2</sub> e	4,064	4,037	4,110	4,558	2,009	4,507
Category 9: Downstream transportation and distribution	tonnes CO <sub>2</sub> e	125,627	104,621	109,260	118,392	112,632	109,381
Category 10: Processing of sold products	tonnes CO <sub>2</sub> e	473,841*	581,463*	693,418	725,649	789,587	943,600
Category 12: End-of-life treatment of sold products	tonnes CO <sub>2</sub> e	629,892*	654,726*	693,027	827,855	806,397	780,090
Category 15: Investments	tonnes CO <sub>2</sub> e	24,866	27,096	35,675	76,308	76,308	76,308
<b>Total Indirect (Scope 3) GHG emissions</b>	<b>tonnes CO<sub>2</sub>e</b>	<b>4,590,668</b>	<b>4,700,076</b>	<b>5,015,409</b>	<b>5,468,167</b>	<b>5,562,318</b>	<b>5,671,528</b>
Upstream indirect (Scope 3) GHG emissions	tonnes CO <sub>2</sub> e	3,336,442	3,332,170	3,484,029	3,719,963	3,777,394	3,762,149
Downstream indirect (Scope 3) GHG emissions	tonnes CO <sub>2</sub> e	1,254,226	1,367,906	1,531,380	1,748,204	1,784,924	1,909,379

Scope 3 categories 11, 13 and 14 are excluded on the basis of relevance or materiality see Basis of Preparation.

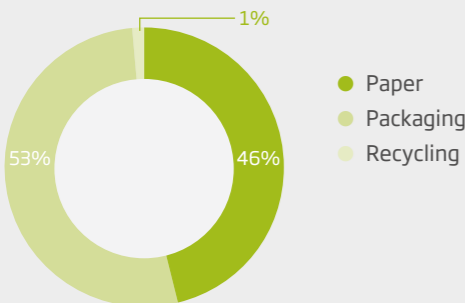
\* Independent Assurance has been obtained for metrics marked “\*”, see the summary statement on page 45.

# Climate change metrics *continued*

Split of Scope 1 and 2 (market-based) by business activity (2024/25) (%)



Split of Total GHG emissions by business activity (2024/25) (%)



## Packaging plants greenhouse gas (GHG) emissions

Metric	Unit of measure	2024/25	2023/24	2019/20 base year	Compared to last year	Compared to base year
Direct (Scope 1) GHG emissions	tonnes CO <sub>2</sub> e	262,647	261,207	289,147	1%	-9%
Indirect (Scope 2 market-based) GHG emissions	tonnes CO <sub>2</sub> e	173,487	178,382	233,012	-3%	-26%
Indirect (Scope 3) GHG emissions	tonnes CO <sub>2</sub> e	2,832,259	2,962,901		-4%	
Total GHG emissions	tonnes CO <sub>2</sub> e	3,268,393	3,402,490		-4%	
Total production	tonnes	4,974,324	4,990,300	4,962,370	0%	0%

## Paper mills GHG emissions

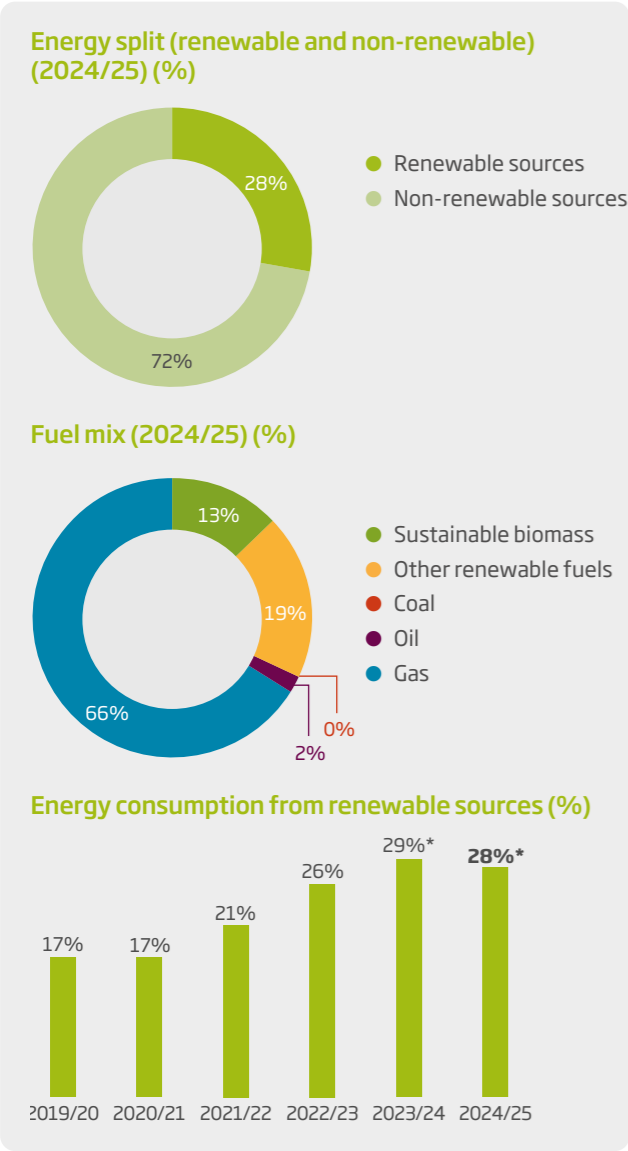
Metric	Unit of measure	2024/25	2023/24	2019/20 base year	Compared to last year	Compared to base year
Direct (Scope 1) GHG emissions	tonnes CO <sub>2</sub> e	1,131,673	1,072,352	1,881,417	6%	-40%
Indirect (Scope 2 market-based) GHG emissions	tonnes CO <sub>2</sub> e	666,526	765,641	557,729	-13%	20%
Indirect (Scope 3) GHG emissions	tonnes CO <sub>2</sub> e	1,070,915	1,076,368		-1%	
Total GHG emissions	tonnes CO <sub>2</sub> e	2,869,114	2,914,361		-2%	
Total production	tonnes	4,224,519	4,123,287	4,210,858	2%	0%

## Recycling depots GHG emissions

Metric	Unit of measure	2024/25	2023/24	2019/20 base year	Compared to last year	Compared to base year
Direct (Scope 1) GHG emissions	tonnes CO <sub>2</sub> e	5,629	6,713	11,326	-16%	-50%
Indirect (Scope 2 market-based) GHG emissions	tonnes CO <sub>2</sub> e	900	899	1,534	0%	-41%
Indirect (Scope 3) GHG emissions	tonnes CO <sub>2</sub> e	76,735	79,908		-4%	
Total GHG emissions	tonnes CO <sub>2</sub> e	83,263	87,520		-5%	
Total production	tonnes	672,591	761,265	1,048,837	-12%	-36%

The breakdown of Indirect (Scope 3) GHG emissions by operation is provided for stakeholders who wish to calculate the emissions generated by operation (e.g. a tonne of paper or a tonne of packaging). Note that there is a remaining balance of 610,759 tonnes CO<sub>2</sub>e Indirect (Scope 3) GHG emissions that, whilst included in the Group total, are not easily allocated to manufacturing sites within the above Packaging, Paper or Recycling operations. This includes infrastructure and non-production-related costs (Categories 1 and 2, Purchased Goods and Services and Capital Goods), processing of external recycling sales to other papermakers that does not physically pass through our recycling depots ('traded waste', accounted for in Category 10: Processing of sold products), employee commuting and business travel for employees based at non-manufacturing sites (Category 6: Business travel and Category 7: Employee commuting), non-manufacturing upstream leased assets (Category 8: Upstream leased assets) and principal equity accounted investments (Category 15: Investments). Until 2022/23, Indirect (Scope 3) GHG emissions were reported on a consolidated basis only. Therefore no breakdown of this figure and Total GHG emissions was provided by operation in prior years.

# Climate change metrics *continued*



## Energy (2024/25)

Metric	Unit of measure	Renewable sources	Non-renewable sources	Total energy consumed
Consumption of fuel (excluding feedstock)	MWh	3,037,573	6,658,676	9,696,249
Consumption of purchased or acquired electricity	MWh	146,828	2,139,479	2,286,307
Consumption of purchased or acquired steam	MWh	865,786	1,404,041	2,269,827
Consumption of self-generated non-fuel renewable energy	MWh	6,409		6,409
<b>Total energy consumption</b>	<b>MWh</b>	<b>4,056,596</b>	<b>10,202,197</b>	<b>14,258,793*</b>

## Fuel (2024/25)

Metric	Unit of measure	For self-generation of electricity	For self-generation of heat	For self-generation of steam	For self-cogeneration or trigeneration	Total fuel consumed
Sustainable biomass	MWh	-	-	-	1,218,672	1,218,672
Other renewable fuels	MWh	-	-	-	1,818,902	1,818,902
Coal	MWh	-	37,844	-	-	37,844
Oil	MWh	-	177,347	-	-	177,347
Gas	MWh	-	14,269	1,117,639	5,311,579	6,443,486
<b>Total fuel consumption</b>	<b>MWh</b>	<b>-</b>	<b>229,459</b>	<b>1,117,639</b>	<b>8,349,152</b>	<b>9,696,249</b>

## Renewables

Metric	Unit of measure	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Energy consumption from a renewable source	Percentage	<b>28*</b>	29*	26	21	17	17
Electricity from a renewable source	Percentage	<b>9*</b>	11*	15	13	12	11

## Energy generation (2024/25)

Metric	Unit of measure	Total gross generation	Generation that is consumed by DS Smith	Gross generation from renewable sources	Generation from renewable sources that is consumed by DS Smith
Generation of electricity	MWh	1,615,999	367,696	517,416	119,163
Generation of heat	MWh	14,269	14,269	-	-
Generation of steam	MWh	4,439,668	4,439,668	2,069,722	2,069,722

## Energy consumption

Metric	Unit of measure	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Energy consumption	MWh	<b>14,258,793*</b>	14,058,435*	14,407,601*	15,324,120*	15,446,225	15,707,667
Energy exported	MWh	<b>1,550,598*</b>	1,525,376*	1,739,186*	1,774,539*	1,739,114	1,977,616
Energy consumption (net)	MWh	<b>12,708,195*</b>	12,533,059*	12,668,415*	13,549,581*	13,707,111	13,730,051

\* Independent Assurance has been obtained for metrics marked '\*', see the summary statement on page 45.



# Environment

## Water and marine resources

# Water management

**Water management is part of Nature, one of the four focus areas of the Now & Next Sustainability Strategy, with the objective of protecting and regenerating nature.**

**The water management targets focus on reducing water withdrawal per tonne of production at mills at risk of water stress and for paper mills and packaging sites to have water management plans.**

Water management is vital to our water-intensive paper-making process and our consumption, recycling and treatment of the water we use must be responsible and efficient.

Water is used as a transportation medium for our primary raw material (fibre) as it is transformed from used paper to recycled paper. It is also used as a means for transferring energy (as steam), within both paper-making and corrugating.

During the reporting period, we had 72 sites located in areas of high to extremely high water stress, as per the latest version of the WRI Aqueduct tool.

We participate in the CDP Water Security questionnaire annually, providing transparency and accountability for performance on water, scoring A for Water Security in 2024.

In our direct operations, approximately half of our sites maintain ISO 14001 certified environmental management systems. These include practical tools to manage water impacts and responsibilities and enable management that is specific and tailored to its locality. Regular reviews are conducted to ensure that responses to water-related risks can be implemented in a timely manner.

During the reporting period, we continue to use EcoVadis, as part of our supplier engagement programme, to set standards relating to water reduction and assess the water performance of our suppliers. This supplements our use of the WRI Aqueduct Water Risk Atlas tool to identify direct operations located in water-stressed areas.

During the reporting period, we refined and updated our methodology for the average water abstracted for own process per tonne of production at paper mills located in regions at risk of water stress, resulting in a more accurate representation of our performance.

In the reporting period, the average water abstracted for own process per tonne of production at paper mills located in regions at risk of water stress was 7.59 m<sup>3</sup> / t nsp (2023/24: 7.52 m<sup>3</sup> / t nsp), reflecting a 10 per cent reduction since 2019/20.

Reducing our freshwater consumption reduces pressure on natural systems and we plan to continue to evaluate how to further support water reduction, reuse and recycle opportunities as we fully integrate with International Paper, ensuring continued impact and alignment with evolving sustainability priorities.

Our major initiatives to reduce freshwater consumption are focused on making improvements at our paper mills as around 95 per cent of the water that we withdraw is used for paper-making.

Water management and reduction in consumption volumes, as well as improvements in water efficiency, are key performance indicators.



Our major initiatives to reduce freshwater consumption are focused on making improvements at our paper mills, as around 95 per cent of the water that we withdraw is used for paper-making. Water management and reduction in consumption volumes, as well as improvements in water efficiency, are key performance indicators.

These initiatives include:

- 1. Reusing freshwater multiple times** - Changing the configuration of machinery, infrastructure and processes to allow water to enter a different part of the process before being returned to the natural environment.
- 2. Recycling freshwater multiple times** - Changing the configuration of machinery, infrastructure and processes to allow water to cycle multiple times within the same process before being returned to the natural environment.
- 3. Optimising water intensive processes** - By improving the processes that require water so that they are more efficient and less resource intensive, such as making changes to how water spray nozzles are configured, with the potential to reduce energy and water consumption.
- 4. Upgrading water intensive equipment** - By investing in new and improved equipment that is less resource intensive, with the potential to reduce energy as well as water consumption. These practices help to reduce water withdrawal and consumption, conserving and protecting water.

### In this section

- Water management
- Metrics



# Water management *continued*

## Water management

During the reporting period, we achieved our target and 100 per cent of our paper mills and packaging sites<sup>1</sup> had water management plans.

Sites that withdrew more than 5,000m<sup>3</sup> of water in 2022/23 and 2023/24 are required to complete a water management plan, and in the reporting period, this covered 99.8 per cent of our water footprint and 58 per cent of our sites in high to extremely high areas of water stress, using the World Resources Institute (WRI) Aqueduct model. Throughout the reporting period, we re-evaluated the water withdrawal at our sites and updated our thresholds accordingly.

In 2023/24, we extended our water management plan, including water stress mitigation planning and water withdrawal reduction initiatives, to all sites, not just those in water-stressed regions. We continued to drive this initiative during the reporting period to achieve our 2025 target.

Our paper mills are required to have water management plans, which provide awareness and allows individual and specific ownership of plans at a site level. Packaging sites are required to have a water scarcity plan, designed to be an appendix to their already existing site Business Continuity Plan (BCP).

Water management plans help sites to be prepared for a variety of situations, such as water disruption, and try to ensure we are using water as responsibly as possible to lessen the impact on the surrounding community.

### Water scarcity plan

At a minimum, the scarcity plan is designed to put an action plan in place in the event of a water loss scenario and includes:

- Water usage mapping on site and water quality
- Identifying relevant stakeholders including relevant fire departments, sanitation, insurance, etc.
- Steps to take once the water supply has resumed to preserve equipment
- Performance and future plans

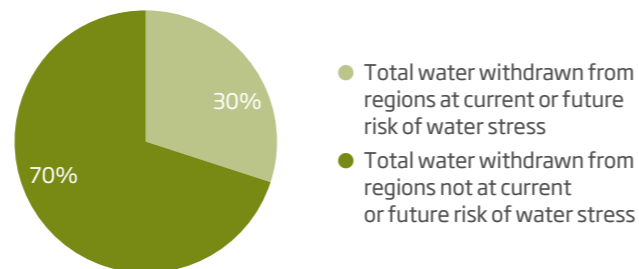
### Water management plan

As a minimum, the plans are required to cover:

- Location and descriptions of all water sources on site
- Description of potential water loss scenarios and actions to mitigate/potential back up solutions
- Emergency team roles and responsibilities
- Reduction opportunities

We intend to continue reviewing the plans annually to identify improvement opportunities.

### Water withdrawal in regions at current or future risk of water stress (%)



1. Sites in scope include manufacturing sites with >5,000m<sup>3</sup> annual water withdrawal



### Ghimbav water scarcity plan

During the reporting period, our Ghimbav sheet plant developed a water scarcity plan that went above and beyond the requirements.

The site completed a deep dive to understand how water was used on site, and created a multi-level emergency response team, a communications strategy, detailed action plans to ensure employee safety, fire security, and operation preservation if a water loss period occurs for less than 24 hours, 1-7 days, or over 7 days.



### Rouen water management plan

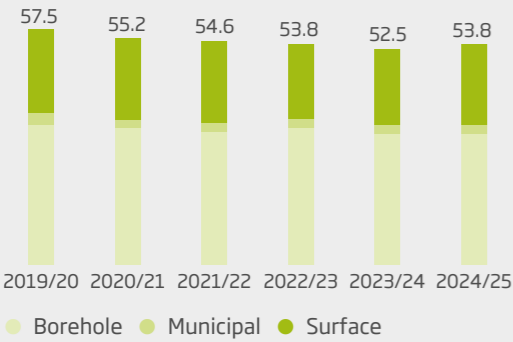
When challenged with producing a comprehensive, detailed water management plan, employees at Rouen paper mill, France, exceeded expectations and requirements.

An action plan and water reduction plans are crucial for the sites continual operations.

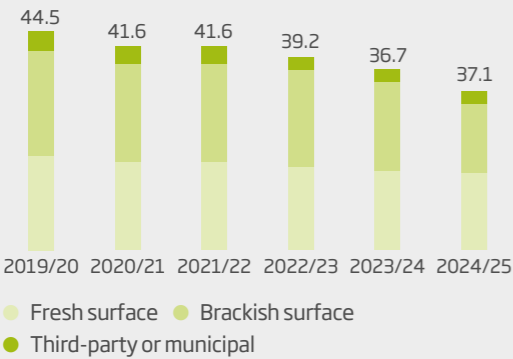
Working across the mill, Rouen employees created a plan that not only included a detailed action plan in scenarios where the site may lose access to their water supply but also included comprehensive water reduction plans to reuse water throughout the paper making process.

# Water metrics

Water withdrawals by source (million m³)



Water discharges by destination (million m³)

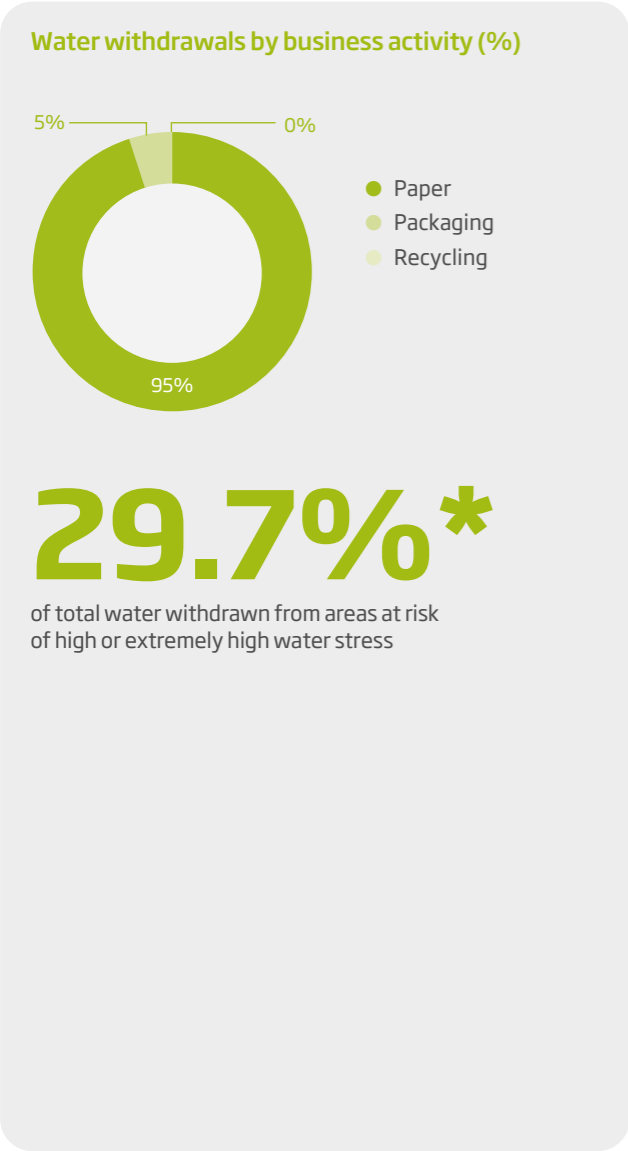


## Water withdrawals and discharges

Metric	Unit of measure	2024/25	2023/24	2022/23	2021/22	2022/21	2019/20
Water withdrawals	m3	53,783,405*	52,477,496*	53,802,571*	54,644,995*	55,237,583	57,451,994
Borehole water	m3	31,881,745	31,799,921	33,202,877	32,359,020	33,417,463	33,997,180
Municipal water	m3	1,999,527	2,200,842	2,270,500	2,062,697	1,950,460	2,858,967
Surface water	m3	19,902,133	18,476,733	18,329,194	20,223,278	19,869,660	20,595,838
Water recirculated for reuse	m3	108,043	111,559	146,383	543,325	473,832	-
Water discharges	m3	37,066,830*	36,737,703*	39,159,644*	41,584,291*	41,560,885	44,543,734
Fresh surface (river)	m3	15,620,789	16,038,527	16,858,349	17,881,245	17,871,181	19,153,806
Brackish surface (sea)	m3	14,208,012	18,225,896.909	19,791,514.0	19,960,460	19,949,225	21,380,992
Third-party or municipal	m3	2,501,098	2,473,279	2,509,781	3,742,586	3,740,480	4,008,936
Total water consumption	m3	16,824,617*	15,851,351*	14,789,310*	13,604,030*	14,150,530	12,908,260
Water withdrawals in areas at risk of water stress	Percentage	29.7*	29*	38	31	36	36

\* Independent Assurance has been obtained for metrics marked ‘\*’, see the summary statement on page 45.

# Water metrics *continued*



Country-level water split (2024/25)

Country	Withdrawal from borehole (m3)	Withdrawal from municipal (m3)	Withdrawal from surface (m3)	Total water withdrawals (m3)	Water recirculated for reuse (m3)	Total water discharges (m3)	Total water consumption (m3)	Total water withdrawals that is in areas at risk of water stress (m3)	Percentage of total water withdrawals that is in areas at risk of water stress (%)
Austria	22,486	1,412	0	23,898	0	14,504	9,394	0	0%
Belgium	0	12,926	2,435	15,361	0	96	15,265	0	0%
Bosnia and Herzegovina	0	82	0	82	0	0	82	0	0%
Bulgaria	526,420	63,560	0	589,980	0	102,923	487,057	0	0%
Croatia	14,930	38,526	3,937,186	3,990,642	0	2,513,537	1,477,105	0	0%
Czechia	10,495	11,643	355	22,493	0	13,916	8,578	0	0%
Denmark	0	26,726	0	26,726	0	15,353	11,373	0	0%
Estonia	0	7,852	0	7,852	0	7,852	0	0	0%
Finland	0	23,468	0	23,468	0	18,102	5,366	0	0%
France	3,790,018	356,320	1,850,990	5,997,328	0	4,890,902	1,106,426	0	0%
Germany	268,602	335,080	3,428,620	4,032,303	36,173	2,633,325	1,435,151	2,057,291	51%
Greece	8,252	53,076	0	61,328	0	49,054	12,274	0	0%
Hungary	10,691	21,660	0	32,351	0	12,081	20,270	0	0%
Italy	1,396,366	84,768	588,048	2,069,181	71,870	1,776,748	364,303	1,872,935	91%
Lithuania	0	13,220	0	13,220	0	6,229	6,991	0	0%
Morocco	0	888	0	888	0	446	442	0	0%
Netherlands	0	50,675	0	50,675	0	29,655	21,021	0	0%
North Macedonia	26,336	7,802	0	34,138	0	0	34,138	0	0%
Poland	364	82,813	0	83,177	0	62,038	21,139	0	0%
Portugal	28,446	23,192	6,271,473	6,323,111	0	4,910,766	1,412,345	6,282,049	99%
Romania	1,613,414	65,722	0	1,679,136	0	1,537,878	141,258	0	0%
Serbia	245	12,997	0	13,242	0	8,932	4,310	0	0%
Slovakia	24,318	3,514	4,238	32,070	0	12,663	19,407	0	0%
Slovenia	465	20,737	0	21,202	0	6,725	14,478	0	0%
Spain	333,165	89,910	3,818,787	4,241,862	0	3,363,908	877,955	4,120,422	97%
Sweden	0	35,591	0	35,591	0	15,204	20,387	0	0%
Switzerland	10,097	3,358	0	13,455	0	2,566	10,889	0	0%
Turkey	4,435	7,958	0	12,393	0	3,022	9,372	0	0%
United Kingdom	7,266,120	152,618	1	7,418,739	0	6,150,328	1,268,412	0	0%
United States of America	16,526,080	391,433	0	16,917,513	0	8,908,081	8,009,432	0	0%
Total	31,881,745	1,999,527	19,902,133	53,783,405*	108,043	37,066,830*	16,824,617*	14,332,697	29.7%

A negative water value indicates a greater volume of water leaving the site boundary compared to entering it, which is typically owed to rainfall or water that is stored across reporting periods.

\* Independent Assurance has been obtained for metrics marked '\*', see the summary statement on page 45.

Environment

Biodiversity  
and ecosystems

Protect and regenerate forests and biodiversity

Our approach to assessing our  
impacts and dependencies  
on nature

Nature and biodiversity are declining fast and have never been more important. DS Smith recognises the vital role that nature plays in the future success of our business, productivity and profitability.

By its very essence, nature is the premium circular economy. It is regenerative by design. We aim to do our part by prioritising keeping resources in use for longer and ensuring processes to extract resources leave room for nature to regenerate.

By sourcing responsibly, managing our forests and operations sustainably and working in partnership with our communities, we help reduce our impact on nature and encourage biodiversity to thrive.

In 2024, our Measuring Nature Working Group, part of our Nature Steering Committee, began our nature-related impacts and dependencies assessment in partnership with the consultancy Nature Positive, sustainability consultants specialising in climate and the environment, biodiversity, water and human rights.

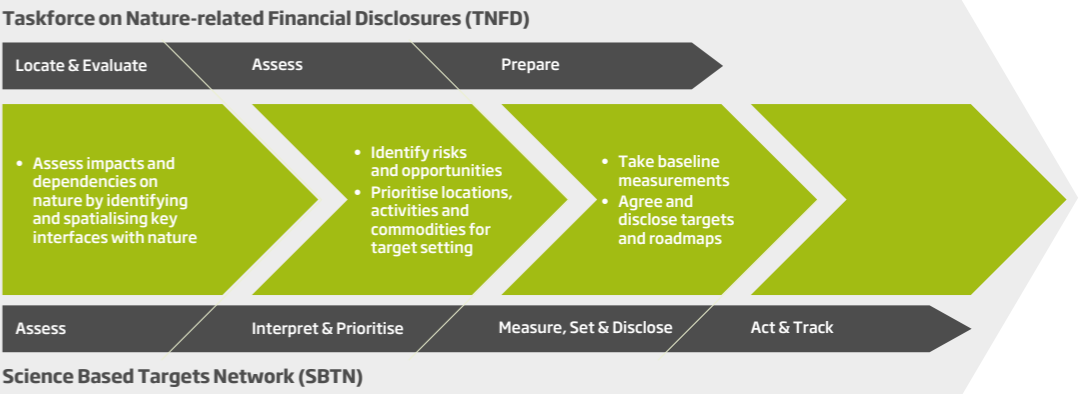
Nature Positive conducted a thorough assessment of the nature-related impacts and dependencies of our operations and supply chain, along with a high-level screening of potential downstream impacts and dependencies. Each aspect of our value chain (upstream, operations and downstream) was addressed separately to identify the most significant nature-related impacts and dependencies.

The assessment followed the initial steps set out in the Science Based Targets Network’s (SBTN) Technical Guidance and the Taskforce on Nature-related Financial Disclosures (TNFD). Although differences exist between the two frameworks, the assessment began with a scoping exercise to identify potential biodiversity impacts and dependencies within our organisational

boundaries. This enabled a materiality screening process to pinpoint locations with the highest potential for nature-related risks and concluded with an in-depth biodiversity impact and dependency analysis using geospatial tools and scientific data. The findings provide a detailed understanding of the ecological implications of our activities and highlight priority areas for mitigation efforts.

The assessment included all paper mills, owned forests, recycling depots, packaging plants and other supporting assets, as identified by us, across our global portfolio. In 2025, we sold our forests in the USA to a third-party nature conservancy organisation. Our Iberian Forest remains in the process of being sold.

Following our acquisition by International Paper, the results from the assessment will help to inform our ambition to set targets to regenerate nature taking a science-based approach by identifying the most material areas on which to focus. These next steps will form part of our work on nature as we go forward and continue our integration into the International Paper family.



- In this section
- Protect and regenerate forests and biodiversity
- Sustainable procurement

2024/25

Future steps



# Protect and regenerate forests and biodiversity *continued*

## Methodology

### Scoping

We identified and classified 415 operational sites using the International Standard Industrial Classification of All Economic Activities (ISIC) system. This helped in our review of materiality using the Science Based Targets Network (SBTN) Sectoral Materiality Tool and Exploring Natural Capital Opportunities, Risks and Exposure (ENCORE) screening tool.

### Risk screening

A screening of all sites and relevant production processes was carried out using the WWF Biodiversity and Water Risk Filters, the UN Environment Programme World Conservation Monitoring Centre (UNEP-WCMC) Sectoral Materiality Tool (SMT) and ENCORE.

The SMT presented an impact screening aligned to the SBTN methodology, ENCORE expanded this screening to include further impacts and potential dependencies, aligned to the Taskforce on Nature-related Financial Disclosures (TNFD), and the WWF Risk Filter suite enabled an initial analysis of location-based sensitivity.

These results were analysed in the context of each location's specific operations and environmental conditions to ensure relevance and a list of high priority sites was developed. High priority locations were based on their interface with nature and potential impact and dependency profile.

1. Geographic influence was defined, for the purposes of this analysis, to be the 10km radius around each site, with a particular focus on impacts within a 1km buffer. For sites identified as material through the SBTN screening process a suitable State of Nature measure was identified, for example the WWF Risk Filter suite.

### Biodiversity impact and dependency analysis

A desk-based review was conducted to map biodiversity features and ecosystem services within each of the priority sites' geographic area of influence<sup>1</sup>, using data from World Resources Institute (WRI) Aqueduct, Corinne Land Use, RAMSAR and Protected Area records (Emerald etc.).

Priority operational locations were assessed using geospatial (GIS) analysis to identify land types, habitats and species potentially impacted within the proximity of the sites.

Relevant policies, processes, controls and data/reporting associated with the various impacts and dependencies were reviewed. This enabled impact quantification where necessary and a greater understanding of the risk profile around key impacts and dependencies.

The likely scale and size of biodiversity impacts and dependencies associated with each site were reviewed based on the site's geographic area of influence. A scientific literature review was conducted to provide an evidence base for identified impacts and dependencies. Existing mitigation processes were considered as part of the analysis.

## Materiality screening

### Science based targets for nature

Materiality screening under the SBTN guidance enables businesses to understand the most important nature-related issues that impact their operations and stakeholders across the value chain.

Through reviewing our operational property portfolio the classification groups relevant to our operations were identified and entered into the SBTN Sector Materiality Tool to identify material pressure categories that need to be assessed to inform potential science based targets for nature.

The results of this exercise clarified the key considerations for further analysis, data gathering and progress in line with SBTN. Results included:

- Machinery and forest sites are considered material for greenhouse gas (GHG) emissions, however we believe we have a well-developed carbon management plan and emissions reduction targets including a science-based target for all scopes, see page 9 for further information.
- Several operational areas identify water and soil pollutants as a material impact. To better understand the potential risk profile and materiality around this topic, further investigation into the types of chemicals used, processes involved and controls in place was carried out. This consisted of a combination of literature review around potential impacts and a review of the operational processes in place at sites.
- Water use was identified as a material impact for many operational sites. Water use data was requested for all sites identified against the relevant ISIC groups.

### Taskforce on Nature-related Financial Disclosures (TNFD)

Locate, phase one of the TNFD Locate, Evaluate, Assess, Prepare (LEAP) approach, is a critical step in identifying how operational locations and value chains interact with and depend on nature.

ENCORE (2024 update) was utilised to screen for likely material impacts and dependencies within our operational sites. The results presented indicated that paper manufacturing sites, packaging manufacturing sites and landfill sites were priorities for assessing impact and dependency pathways.

There were 19 sites identified to have protected areas within 500m of the point data and, following review of distance from protected areas, types of habitats and land use between the site and the protected area, along with the presence of water bodies which may provide potential impact pathways, seven sites were selected for inclusion in the final list of priority sites to be assessed for impact and dependency pathways. Seven further sites were selected as priority sites for further review based on scores identified in the WWF Biodiversity Risk Filter. Two additional sites were added to the list of priority sites due to their high levels of water use, identified through the review of primary data.

Locational analysis, literature review findings and evidence were used to inform an impact and dependency workshop in which each site was assessed to confirm relevant pathways. This workshop was used to integrate the locational analysis against the expected impact and dependency profile identified through the Locate phase screening, literature review and communication with Measuring Nature Working Group.

## Recommendations

Based on the analysis completed by Nature Positive to identify our material nature-related impacts and dependencies, several actions were recommended to help manage these in the future.

Considerations include how impacts could be mitigated or removed, the ecosystems that we rely on could be protected and resilience built around operations, along with potential risks and opportunities that could be further assessed.

These recommendations will continue to inform and shape our approach and ambition as we work towards a combined International Paper sustainability strategy.



# Protect and regenerate forests and biodiversity *continued*

**Nature is one of the four focus areas of the Now & Next Sustainability Strategy, with the objective of protecting and regenerating nature. The Now & Next targets focus on assessing our dependencies on nature with a view towards setting targets to regenerate nature, taking a science-based approach.**

The circular economy is an approach that is inherently restorative and sustainable. It places a strong emphasis on maximising the lifespan and utility of resources through reuse, recycling and repurposing. It ensures that processes involving the extraction of natural resources are carried out in a manner that preserves biodiversity allowing for the regeneration of natural ecosystems.

By sourcing responsibly and using sustainable forest management practices, we strive to reduce our impact on nature and encourage biodiversity to thrive. Protecting and regenerating forests and biodiversity is essential to ensure the survival of plant and animal species, genetic diversity and natural ecosystems.

## Protect and regenerate forests and biodiversity

We have established strong foundations intended to reduce our impact on nature by sourcing responsibly, managing our forests and operations sustainably, and working in partnership with our communities.

In Georgia, USA, we continued our collaboration with the University of Georgia with regard to our forests. Elise McDonald, a graduate student studying Forest Biology, continued her study on the effects of pine straw management on wild bee communities, and found significant differences in pollinator presence between stand types. This research is an important area of focus in forest management and biodiversity, but has been historically understudied. In a broader scale, this study bridges gaps in conservation, forest management, and research to contribute to operationally feasible solutions to wild pollinator biodiversity. Aisha Nobles, a natural resources master's student, also continued her work identifying gopher tortoise burrows and presence across DS Smith forest tracks.

## Biodiversity programmes

All 14 paper mills have continued to complete at least two years' worth of biodiversity activity to date. Biodiversity programmes aim to sustain and support the variety of plants, animals and the ecosystem health at and surrounding our paper mills, including the communities of which they are a part.

Site-based initiatives are often employee led and demonstrate their commitment towards local biodiversity.



### Witzenhausen Mill

Over the past several years, the Witzenhausen Mill has improved the biodiversity of its grounds and surroundings through a project to create wildflower meadows in 2021/22 and working with a local association to support beekeeping courses for local youth in 2023/24.

In the reporting period, the Witzenhausen team collaborated with employees of the Geo-Nature Park and with children from a local school primary school to introduce the concept of native birds and bats to the students.

The students built 125 nesting boxes and bat boxes to support critical local wildlife populations in the local area.



### Kaysersberg Mill

The Kaysersberg project team has focused on building native, pollinator friendly areas surrounding the mill since 2022/23, when they established a wildflower meadow on-site. The following year, the team collaborated with local organisation Sentinelle Nature to build insect hotels at the mill's entrance to further promote native insect habitat.

In the reporting period, the team established contact with a biodiversity consultancy, Efikos, that supported the site in a biodiversity audit. The audit quantified habitats present on-site, along with expected animal types, and created an biodiversity action plan for the site to follow to enhance biodiversity. The team at the mill plans to implement some of the objectives laid out in the audit in the coming years.



### Reading Mill

Since its inception in 2021/22, Reading Mill's 'Industrial Margins for Nature' project has involved maintaining several beehives in a previously unused concrete area of the mill site.

Over the years, the hives have nearly doubled, with more employees on-site becoming involved with splitting hives, caring for the bees and planting native pollinator-friendly wildflowers.

Last year, the team harvested honey for the first time, collecting over 100 pounds. In the reporting period, the colonies that survived winter were split once again, and the honey harvest will continue through the year.

# Sustainable procurement

We value the relationships we have with our suppliers. We collaborate with them on topics such as responsible sourcing, carbon and human rights. We encourage our suppliers to improve their resilience and sustainability.

Our upstream value chain and nature

Whilst we have plenty to do to make our own operations even more sustainable, we recognise that there are also significant positive impacts we can have on our own supply chain.

Our upstream value chain in particular, like many industries, is dependent on the provision of natural resources and ecosystem services that regulate the climate for humankind’s benefit.

For example, although we recycle used packaging, sustainably sourced virgin fibre is required as a primary raw material and as a renewable fuel, in the form of biomass. Water is also a crucial natural resource used to transport fibres through the process and as a conduit of energy in the form of steam.

Impacts and dependencies

During the reporting period, we continued our project to assess our dependencies on nature, one of the first steps to setting targets to regenerate nature. We took a science-based approach, with reference to the Taskforce on Nature-related Financial Disclosures (TNFD) recommendations and technical guidance from the Science Based Targets Network (SBTN).

We have completed an assessment of our supply chain (alongside direct operations and a downstream assessment), comprehensively locating the interfaces with nature and prioritising sensitive locations. In 2025/26, with International Paper, we aim to develop the recommendations we received as part of our new framework.

As part of our EU Deforestation-Free Regulation (EUDR) preparation, we have completed screening exercises and a risk assessment. Our approach to EUDR will in turn help us develop a deforestation policy. We are working hard to be ready to comply with EUDR in line with the legislative timelines.

## Sustainable procurement

Setting high standards

Our Global Supplier Standard (GSS) documents the expectations that we have of our suppliers in relation to sustainability and responsible business, based on the internationally recognised Ethical Trading Initiative base code.

Moving forward, we continue to aim to ensure that 100 per cent of our suppliers agree to comply with our standards. During the reporting period, 92 per cent of our suppliers agreed to the GSS.

Assessing suppliers

We use EcoVadis to assess supplier performance, involving 100 per cent of our strategic and critical suppliers (see page 50 for how we define a ‘strategic’ supplier).

We work with suppliers to develop action plans to address weaknesses on environmental, labour, human rights and ethical issues. This helps us to monitor challenges and opportunities within our supply chain, allowing us to choose not to buy from suppliers whose performance is deemed inadequate.

Encouraging improvements

We address under-performing suppliers in line with our Supplier Management Policy. We use on-site audits for suppliers who fail to meet our standards. We engage with suppliers of concern by retraining and educating them in the first instance, to then consider whether we continue working with them.

Reducing emissions

We engage with our strategic suppliers to encourage them to set science-based targets. This includes helping to enable our suppliers to calculate their carbon footprint, set a science-based target and begin reducing emissions. For those further along the journey, we review their progress and plans.

Monitoring supply chain risk

We use EcoVadis IQ to apply predictive intelligence to monitor and assess risk and ethical business conduct in our supply chain. This tool helps us to identify suppliers, countries and categories that potentially pose any risks and address these appropriately.

Responsible sourcing

In this table, ‘assessed on sustainability’ refers to either undertaking the EcoVadis sustainability ratings assessment, or other means. Improvement plans, initiated actions and completed actions refer to those issued within the EcoVadis platform. We define ‘strategic suppliers’ as companies with whom we have a long-term, mutually cooperative relationship with mutual commitment where significant and ongoing value is accrued to both parties through operational capabilities. During the reporting period, we categorised 112 of our suppliers as strategic.

Metric	Unit	2024/25	2023/24	2022/23	2021/22	2019/20
Suppliers agreed to our Global Supplier Standard (GSS)	% of suppliers	92	90	78	78	11
Strategic suppliers agreed to our Global Supplier Standard (GSS)	% of suppliers	100	100	100	100	74
Strategic suppliers assessed on sustainability	Number	100	100	100	100	74
Suppliers engaged in improvement plans	Number	31	31	63	68	18
Initiated actions to improve performance	Number	99	99	444	330	239
Completed actions to improve performance	Number	31	31	222	167	139

Paper certifications

In this table, the statistics reflect papers purchased through our centralised Paper Sourcing platform.

Metric	Unit	2024/25	2023/24	2022/23	2021/22
FSC® Mix	% of papers	5	6	6	7
FSC® Recycled	% of papers	77	76	75	73
FSC® Controlled Wood	% of papers	18	18	19	20



# Environment

## Resource use and circular economy

# Design out waste and pollution

**Circularity is one of the four pillars of the Now & Next Sustainability Strategy, with the objective of designing out waste and pollution and keeping materials in use. The Now & Next targets focus on fibre optimisation, plastic replacement, zero waste to landfill and recyclability/reuse.**

**We align to our customers' needs, responding with agility and helping drive their sustainability agenda. Our customers remain keen to use less plastic and improve the sustainability of their packaging.**

## Fibre optimisation

Optimising fibre plays a key role in optimising the use of resources to foster the transition to a more circular economy.

During the reporting period, key actions included using our Circular Design Principles to guide our designers towards creating packaging solutions with optimised resources tailored to our customers' supply chains, ensuring their products remain safe and protected whilst on the move, whilst minimising material consumption. Several initiatives were launched during the period to collect higher-quality supply chain data, resulting in 96.1 per cent of designs optimised for individual supply chains (2024/25: 90 per cent), helping reduce material consumption.

This target covered 77 of our packaging plants, representing 79 per cent of our manufactured volume in Europe, where we measure the board performance during the manufacturing process, based on supply chain, production and customer data over the course of the year.

### Supply chain optimisation ratings

Board Strength Index Requirement (BSIR) is a rating used to qualify supply chain information at the point of solution development. We use it in assessment of the quality and known accuracy of supply chain conditions.

#### BSIR 1: Specification is fully DS Smith validated

Our PackRight process has generated a comprehensive supply chain study from which we have created a design solution. Material defined in the solution has been optimised to meet the requirements of the article and its entire supply chain.

#### BSIR 2: Solution specifications calculated using customer data

Our PackRight process has been utilised to gather comprehensive customer supply chain data from which we have generated a design solution. Material defined in the solution has been optimised to meet the requirement of the article, its anticipated supply chain and customer-defined criteria.

#### BSIR 3: BSIR calculated using standard parameters

Our PackRight process has been utilised to gather essential customer supply chain data. Customers have supplied specific criteria that have to be met as part of the design solution, e.g. material specifications are defined using supply chain model assumptions and experience-led reasoning.

#### BSIR 4: Specification identified as an opportunity for supply chain optimisation review

BSIR Level 4 is raised based on customer-specific information only with no design interaction. Our aim is to seek more information regarding actual supply chain conditions so we may optimise the individual solution specification. Where we are successful, we predict this will result in an uplift in BSIR classification to level 1, 2 or 3 (supply chain optimised). Due to data coverage and quality, the ratings are not available for all packaging solutions at all sites.

## Plastic replacement

In 2023/24 we surpassed our target to replace, avoid or reduce 1 billion pieces of plastic with a cumulative total of over 1.2 billion since we set this target in 2020/21. During the reporting period the total increased to 1.7 billion.

We continue to see demand for plastic alternatives, which demonstrates a strong appetite for fibre-based packaging.

Our Sales, Marketing and Innovation (SMI), Group Innovation, and Group Research & Development (R&D) functions innovate to deliver fibre-based solutions as an alternative to our customers' plastic packaging.

During the reporting period, we continued to streamline our data capture and reporting capabilities, with 94 per cent of our reporting countries now doing so directly from their site-level ERP systems. This has further improved our reporting capabilities, enabling us to add many recyclable fibre-based packaging solutions to the portfolio of products used and sold to our customers, including e-commerce and retail.

Additionally, campaigns were launched targeting common sources of plastic for our FMCG (fast moving consumer goods) customers, such as produce trays.

Over

# 1.7 billion

pieces of plastic replaced, avoided or reduced with alternative fibre-based solutions since 2020/21

Over

# 58,000

packaging design decisions influenced by our Circular Design Metrics

### In this section

- Design out waste and pollution
- Redefining packaging with our customers
- Keep materials in circulation
- Metrics



# Redefining packaging with our customers

**We help our customers by designing packaging solutions that help to achieve their sustainability and recyclability goals, bringing our customers into the circular economy.**

Our customers want to tackle plastic pollution, improve recycling rates and develop circular business models. They trust us to partner with them to achieve their sustainable packaging strategies, utilising our expertise in innovative solutions and resilient supply to increase recyclability and reduce value chain emissions.

Over the past year, we have engaged with customers on topics including decarbonisation plans, fibre sourcing and human rights.

Our engagements often involve large global FMCG brands with mature sustainability strategies, with whom we have long-term relationships, increasing the degree of leverage and impact of our collective actions.

## Circular Design Metrics

Our Circular Design Metrics make it easy for our customers to compare the sustainability performance of different packaging designs, immediately seeing the indicative impact of design decisions across eight powerful metrics.

Our customers are using the metrics to measure and compare the circularity of different solutions at a glance, helping them to select the best solution based on their priorities.

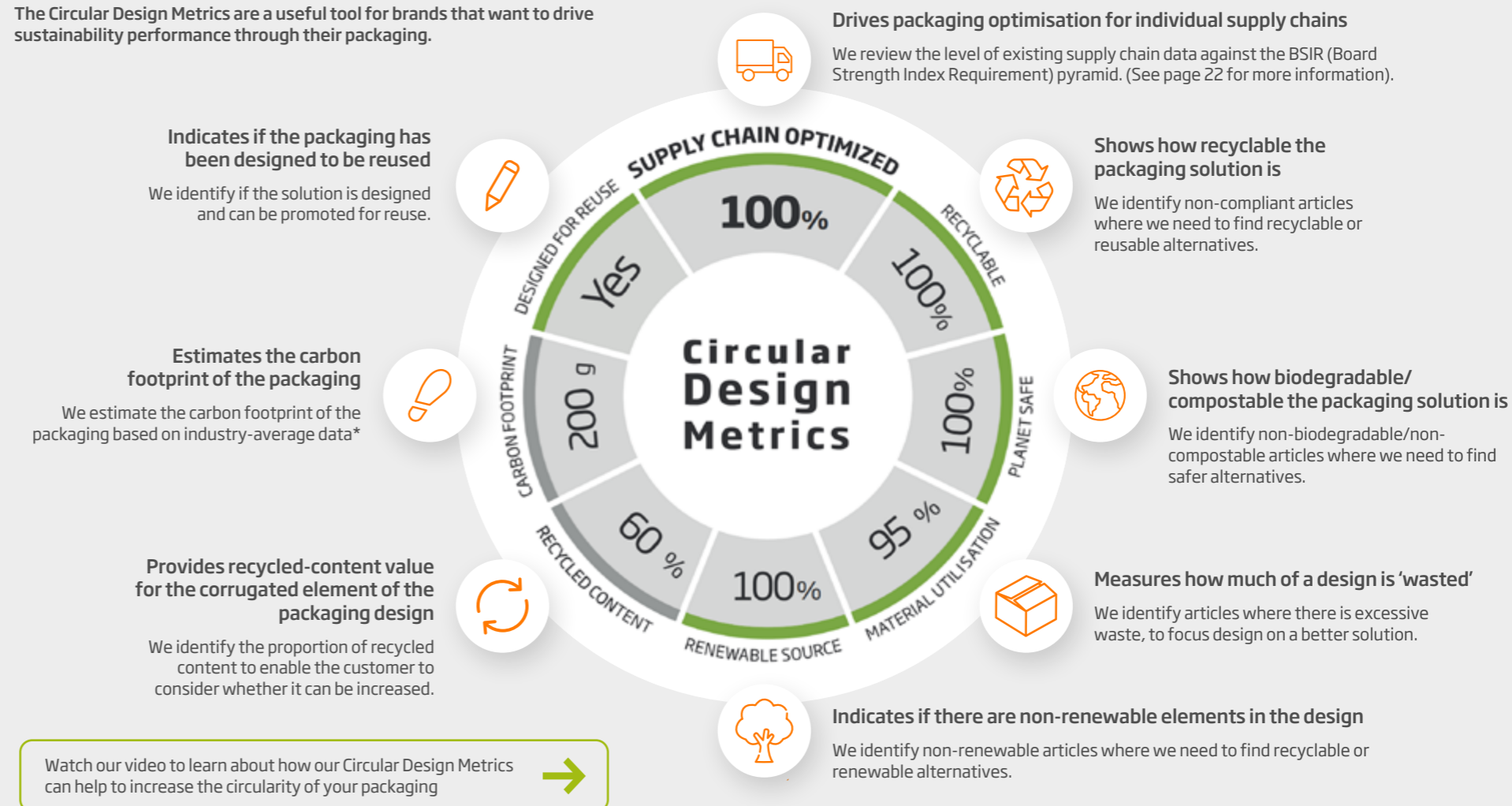
The metrics present an opportunity to quantify and improve the impact packaging has on the environment, including its carbon footprint<sup>1</sup>.

The metrics are supported by our Circular Design Principles, utilised by our expert design and innovation community they help to ensure that supply chain conditions are integrated into the design process. This results in leaner packaging that maintains required strength, resilience and recyclability properties.

1. Carbon footprint calculation is based on industry-average data from the FEFCO cradle to grave life cycle assessment. The life cycle inventory data and methodology can be obtained from <https://www.fefco.org/lca/>

## Powerful metrics to see and compare packaging sustainability

The Circular Design Metrics are a useful tool for brands that want to drive sustainability performance through their packaging.





# Keep materials in circulation

## Zero waste to landfill

During the reporting period, 164,840 tonnes of waste was sent to landfill (2023/24: 165,840 tonnes), a 0.5 per cent decrease compared to last year and a 51 per cent decrease overall since 2019/20.

Throughout the reporting period, we have been designing stronger controls and seeking out alternative solutions for our packaging plant waste management practices and alternative waste destinations deployed at our paper mills for waste that would otherwise be sent to landfill.

By diverting waste to energy operations our Rouen paper mill in France has halved their waste to landfill and our Lucca paper mill in Italy reduced their waste to landfill entirely.

At Alcolea, a new compactor dewatering unit has resulted in a reduction of 2,000 tonnes of waste sent to landfill annually.

During the reporting period, our Waste Working Group, part of our Carbon, Water, Waste Steering Committee, completed waste mapping exercises several sites and developed the waste reduction roadmap aimed at identifying the most significant sources of landfill waste.

We plan to continue working proactively with our recycling customers, policy makers and trade associations to improve segregation and collection methods, whilst advocating for segregated recycling.

## Keep materials in circulation

During the reporting period, over 99.6 per cent of our manufactured packaging solutions continued to be either reusable or recyclable, a target achieved in 2021/22 that we have continued to maintain.

The remaining 0.4 per cent are fibre-composite materials (meaning that they contain non-fibre materials), where fibre still accounts for upwards of 80 per cent of the construction, though a non-fibre material is required for reasons such as:

- Food hygiene regulations (e.g. barriers for fresh meat trays)
- Prolonged water exposure (e.g. wax coatings for fish)
- Supply chain impact absorption demands (e.g. foam inserts)

We have continued to maintain the same performance as last year (2023/24: 0.4 per cent) as alternatives to some non-fibre materials are slow to market and cannot yet be commercially scaled to make them a viable solution. Maintaining this level of performance is an achievement as we have seen continued customer demand in fibre-composite solutions, such as printed barriers and laminated solutions, to replace plastics.

### Reusable packaging

During the reporting period, we achieved our 2025 target to test up to five reuse pilots; two have been completed, three are ongoing beyond April 2025, and further opportunities are in development.

The pilots are intended to provide us with important insights into the market demand for reusable fibre-based packaging, and the products and services needed to build an effective and efficient reuse system at scale.

Our customers are able to evaluate the economic, environmental and operational impact of reusable fibre-based packaging and take data-driven decisions for their specific products and supply chains.

### Reuse pilots

- **Reusable container** A pilot with a large e-commerce retailer in Europe tested the design and performance for handling apparel within the customer's operational environment and achieved up to four reuse cycles.
- **Reusable and flexible e-commerce mailer** A pilot was completed with Returnity, a reusable packaging and system provider in North America. Our innovation was tested in their processing system and achieved five trips in the e-commerce delivery network, which informed further product refinement. It has since been nominated for a Sustainability Award.
- **Reusable envelope** The deployment of our recyclable reuse solution is in progress with the e-commerce partner, Hipli, in France. The patented design comes with a clever single-use locking system and a QR-coded traceability system. We are aiming to determine the number of reuse cycles achievable in a real e-commerce environment.
- **Reusable and foldable pallet box (1)** A pilot is ongoing with an industrial customer in the Nordics. We are working to demonstrate the benefits of an improved corrugate fibre design within their inbound and outbound logistics and warehouse environment.

- **Reusable and foldable pallet box (2)** An ongoing pilot with a customer in Eastern Europe to test our fibre box design within their supply chain and compare against a wooden alternative.

### Reuse Working Group

Our Reuse Working Group, which reported to the Circularity Steering Committee during the reporting period, included cross-divisional representatives focused on identifying and supporting new reuse initiatives, ensuring alignment with existing and forthcoming legislation, such as the Packaging and Packaging Waste Regulation (PPWR), exploring partnerships with reuse service providers, and marketing and communications on the position of fibre in the reusable packaging market.

The working group identified, over 50 great examples of reusable fibre-based packaging solutions from across the business, typically offered to customers at local level in B2B and closed loop environments which lend themselves well to reuse, such as:

- Foldable and returnable boxes to enable multiple refill cycles in a supply chain
- Reusable cardboard trays for repeated short distance transportation
- Reusable and durable cardboard pallets and industrial cases for storage systems

### Recyclability

During the reporting period, our Recyclability Working Group, which reported to the Circularity Steering Committee, included cross-divisional employees focused on consistency and helping ensure alignment with existing and forthcoming legislation.

During the reporting period, we continued to assess any new non-fibre materials introduced into our business from the outset through our robust innovation stage gate process.

This helps ensure that new materials are compliant with our standard of being recycled at scale and in line with any legislative requirements. As a result, we expect to be in a stronger position to drive recyclable solutions and exploit new opportunities.

Our target for all of our packaging to be recycled or reused by 2030, aims to keep components in circulation, whilst reducing emissions from the end-of-life treatment of fibre-based materials that, although recyclable, are not always recycled at scale in some countries.

## Circular Design Principles

As over 80 per cent of a product's environmental impact is determined at the design stage, enabling circularity through design is essential. Our Circular Design Principles, launched in 2020 in collaboration with the Ellen MacArthur Foundation, provide a framework to stimulate circular design innovation, ensuring that packaging is designed to meet its purpose with minimal excessive environmental impact.



### We protect brands and products

Designers must always ensure that packaging successfully protects its product. Damaged products from poor packaging have a negative economic and environmental impact



### We use no more materials than necessary

Optimising materials and structures based on the actual performance requirements throughout the supply chain helps us design out waste and pollution



### We design for supply cycle efficiency

Our designers drive efficiency by changing the layout of products within boxes for stacking in delivery vehicles



### We keep packaging materials in use

We eliminate waste by keeping packaging products in use for as long as possible, recycling material again and again



### We find a better way

We empower our designers to challenge the status quo and support customers in the drive for a circular economy

Throughout the reporting period, we continued to refine and develop our recycling rate calculations, focusing on data granularity dependencies, which has enabled us to improve our data quality and calculations further.

In the reporting period the Circularity Steering Committee through a working group continued focusing on the delivery of targets. The cross-divisional representatives of the working group focused on all our packaging being recycled or reused by 2030. Their work concentrated on three main work streams: data, innovation and thought leadership.

# Resource use and circular economy metrics



### Waste destinations

Metric	Unit	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Total waste	tonnes	1,441,792*	1,385,247*	1,438,424*	1,510,728	1,623,229	1,641,493
Recycled	tonnes	926,241*	895,810*	912,649*	949,442	1,056,831	1,038,275
Landspread	tonnes	192,013*	179,901*	176,206*	162,455	184,679	156,123
Incinerated	tonnes	158,697*	143,696*	144,932*	142,911	123,494	105,168
Landfilled	tonnes	164,840*	165,840*	204,637*	255,920*	258,225	341,927
Recycling rate	Percentage	64%	65%	63	63	65	63
Hazardous waste	tonnes	5,694	3,958	3,683	3,424	3,120	3,940

\* Independent Assurance has been obtained for metrics marked ‘\*\*’, see the summary statement on page 45.

# Resource use and circular economy metrics *continued*

### Chemical safety

We take steps designed to help ensure that any chemicals or hazardous substances used in our manufacturing processes are deployed in a manner that minimises risk to people and the environment. Where possible, we are selective in our use of materials, chemicals and substances that may be of human health and/or environmental concern and we substitute or eliminate Substances of Very High Concern (SVHCs) from our manufacturing processes. Our practice is to comply with Regulation EC 1907/2006 on the Registration, Evaluation, Authorisation and Restriction of Chemicals as amended ('REACH Regulation') for all personnel involved in the procurement, storage, handling and use of chemicals. This involves monitoring the candidate list of SVHCs to identify additions to the list to evaluate with respect to our products and notify relevant stakeholders where appropriate. We monitor 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.

### Customer and product safety

We have a duty to ensure that all our products achieve legal compliance where they are marketed. Within the corrugated packaging industry, the most significant product safety impact is in food packaging, which with FMCG, including food, represents the majority of our customer base. We have policies and procedures in place, and provide training to our people, to seek to ensure compliance with applicable product safety laws and standards. We work together with our suppliers to select safe additives and raw materials for our paper mills and packaging sites. In the paper division, we apply Good Manufacturing Practice (GMP) principles in our manufacturing and conduct regular purity testing of the paper grades produced at our mills as part of our compliance schemes. In the Packaging division, our procedures require food contact products to be risk assessed before production. In 2024/25, we had zero (2023/24: zero product safety-related recalls).

### Country-level waste split (2024/25)

Country	Recycled (tonnes)	Incinerated (tonnes)	Landsread (tonnes)	Landfilled (tonnes)	Total waste (tonnes)
Austria	15,745	245	0	40	16,029
Belgium	13,281	85	0	0	13,365
Bosnia and Herzegovina	0	0	0	0	0
Bulgaria	12,339	22	0	11	12,373
Croatia	16,163	1,012	0	14,028	31,204
Czechia	14,111	0	0	96	14,207
Denmark	18,175	231	0	0	18,406
Estonia	53	22	0	38	113
Finland	5,922	92	0	15	6,029
France	133,971	26,098	34,791	4,611	199,470
Germany	108,977	48,003	139	3	157,122
Greece	16,017	0	0	57	16,074
Hungary	20,848	193	0	237	21,278
Italy	167,166	9,969	2,392	208	179,735
Lithuania	6,660	79	0	14	6,753
Morocco	379	0	0	0	379
Netherlands	16,378	388	0	0	16,767
North Macedonia	2,275	1	0	0	2,276
Poland	40,168	108	0	144	40,421
Portugal	19,868	34,070	10,344	12,724	77,005
Romania	47,590	148	0	381	48,120
Serbia	8,097	0	0	44	8,141
Slovakia	5,786	15	0	17	5,817
Slovenia	13,543	1,657	0	34	15,235
Spain	60,284	191	14,181	39,987	114,644
Sweden	18,469	434	0	0	18,903
Switzerland	7,497	57	0	0	7,555
Turkey	4,138	2	0	0	4,140
United Kingdom	95,597	35,554	109,427	60,463	301,041
United States of America	36,743	19	20,740	31,687	89,190
<b>Total</b>	<b>926,241*</b>	<b>158,697*</b>	<b>192,013*</b>	<b>164,840*</b>	<b>1,441,792*</b>

Independent Assurance has been obtained for metrics marked \*\*, see the summary statement on page 45.



# Social

We are equipping our people to transition to the circular economy whilst we play an active role in our local communities.

We are engaging people on the circular economy and strive to have a diverse and inclusive workplace.

---

## In this section

→ [Own workforce](#)

---



# Social

## Own workforce

# Engaging our people

**In 2023/24, we refreshed our listening strategy and increased the frequency at which we sought employee feedback. Building on this foundation, we continued implementing the strategy through diverse channels in 2024/25, providing employees with increased opportunities to voice their opinions and drive change.**

### Pulse surveys

Throughout the reporting period, we sustained the use of pulse surveys and, in preparation for the combination with International Paper, significantly amplified our employee listening initiatives and efforts to address feedback raised by employees. Over the course of the year, a monthly pulse survey garnered over 18,000 employee responses, revealing a positive reception to our communication efforts and enthusiasm for growth prospects.

### Engagement survey

Complementing the regular pulse surveys, we conducted two comprehensive engagement surveys in Spring and Autumn. Despite challenging employment conditions across Europe, we witnessed a notable rise in employee engagement levels, a testament to our sustained focus on follow-up actions and addressing concerns.

Furthermore, we observed improvements in employee perceptions across several key areas: safety (+4 per cent points), recognition (+3 per cent points), inclusion (+6 per cent points), and management practices (+2 per cent points). These gains demonstrate our ongoing commitment to fostering a positive and inclusive work environment.

### Onboarding

During the reporting period, we continued to improve our onboarding experience, to ensure new colleagues are engaged and become productive as soon as possible. These improvements included embedding our redesigned onboarding process, releasing our onboarding e-learning in 11 core languages and finalising our onboarding hub in which employees can access all

the key information, processes and tools they need as a new starter. Additionally, we have rolled out automated emails via our human resources information system in Europe to new joiners welcoming them to the organisation and signposting the information they need, as well as supporting automated emails for their line managers.

### Health and safety culture

During the reporting period, our primary focus has continued to be the implementation of Vision Zero, launched in 2022/23. Vision Zero is our Health and Safety strategy, which includes activities designed to focus on leadership, engagement, processes and culture, to achieve our health and safety target of zero harm.

Through close collaboration with our leadership team, we have continued to build on the cultural transformation improvement started in 2023/24. Through leadership's influence we are enhancing the level of safety and well-being engagement within our organisation, whilst continuously eliminating risks at the operational level.

During the reporting period, there were 10.6 per cent more leader-led health and safety activities, including approximately 75,874 safety talks, 219,758 observation tours and 215,993 leader-led risk assessments, in comparison to 2023/24.

### Diversity, equity and inclusion (DE&I)

During the reporting period, we had a 37 per cent increase in membership in our active networks. The active networks work in partnership with the Talent team to raise greater awareness and commitment to DE&I.

Our active networks foster a sense of belonging by creating a safe and supportive space for employees who share a common sense of identity. The networks offer a platform for members to openly discuss their experiences and perspectives, which in turn can lead to positively building wellness through greater empathy and understanding.

Active networks promote awareness through various means and open pathways for engagement and communication across the business. In 2024/25 our active networks, with the support of their executive sponsors, held 20 events, including informal coffee breaks and roundtable discussions on a variety of key topics requested by their members.

### European Works Council

Our European Works Council (EWC), has up to 50 representatives from across the business. It engages twice a year with management to provide further feedback and discuss opportunities to improve. Regular engagement with regional leads, as well as both safety and diversity committees, ensures we have a regular two-way dialogue on employee matters across Europe.

### Circular economy

In the reporting period, we reached 96 per cent of our people on the circular economy (2023/24: 76 per cent). We will continue to reach our remaining 4 per cent of colleagues throughout the rest of 2025, focusing on non-wired employees.

Our ambition to engage all of our people on the circular economy encourages a continuous focus on circularity, both in their personal and daily working lives. We aim to equip our people to lead change individually, as well as with our customers, communities and others.

During the reporting period, we held team briefings, quizzes for employees and provided resources, such as e-learning modules. Colleagues in Benelux developed a Sustainability Awareness Training delivering sessions to customer service and supply chain teams at local sites to understand and drive circularity, both at home and at work. Thanks to this training, our Benelux sites have developed roadmaps to support in leading the transition to a low-carbon, circular economy, and raising awareness of how we all, as individuals and a business, can contribute. In the reporting period we made this training available across the business.

Additionally, 13 employees completed the Circular Economy Masterclass, delivered by the University of Exeter Business School and supported by the Ellen MacArthur Foundation, during the reporting period.

During the reporting period, we continued to engage people on the circular economy and circular lifestyles and reached 14.5 million people cumulatively since 2020/21, achieving our 10 million target, five years early.

We achieved this through continuing to share valuable information through our website and social media posts regarding the circular economy and circular lifestyles. Our circular economy lesson plan has been downloaded and delivered to over 5,400 students in the reporting period alone.

#### In this section

- Engaging our people
- Create safe, diverse and inclusive workplaces
- Developing our people
- Diversity, equity and inclusion
- Respect human rights
- Engaging our people and communities
- Metrics



# Create safe, diverse and inclusive workplaces

## Health and safety highlights

People and communities is one of the four focus areas of our Now & Next Sustainability Strategy, with the objective of creating a safe, diverse and inclusive workplace and being active in our communities. The Now & Next targets focus on our approach to health, safety and well-being, supporting our ambition for all our people to return home safe and unharmed at the end of the day, and raising awareness of the importance of diversity and inclusion.



**10.6%**

increase in leader-led health and safety activities compared to 2023/24

**10%**

reduction in total number of accidents compared to 2023/24

**263**

sites with zero accidents this year across the Group

**10.6%**

increase in leader-led health and safety activities compared to last year

**8.8%**

reduction in the total number of employee Accident Frequency Rate (AFR)

**85 sites**

with zero Lost Time Accidents in the last 5 years



## Safety Excellence Awards

We are proud to recognise outstanding performance through the DS Smith Safety Excellence Awards.

In the reporting period, 250 of our manufacturing facilities participated in our internal Safety Excellence Awards, of which 70 were awarded for consistently demonstrating high standards in safety and well-being.

43 sites earned the Gold Award, and 27 sites achieved the Platinum Award, recognising over a decade of world-class safety performance.

We remain committed to building a culture where safety is more than a priority, it is a value shared by all.



## Best practice

We are constantly working to reduce risks to ensure our employees' health and safety through a variety of methods.

During the reporting period, we installed LOTOTO (Lock Out, Tag Out, Try Out) training stations directly on site. The stations give operators hands-on practice with our safety operating procedures for electrical, pneumatic, and hydraulic equipment in real, controlled scenarios.

The training is led by supervisors and experienced colleagues, not safety coordinators. This peer-to-peer learning boosts engagement and strengthens our institutional memory, as lessons and best practices are shared across teams.



# Create safe, diverse and inclusive workplaces *continued*

## Health and mental well-being and occupational safety programmes

We believe that well-being is one of the cornerstones of a profitable, innovative, and sustainable business and an important aspect of health and safety.

Our Well-being Framework provides our people with tools, inspiration and support to thrive, focusing on four key areas:

- **Taking the lead** - Encouraging everyone to set a positive example and champion well-being visibly and demonstrably.
- **Learning and development** - Providing knowledge and information to empower people to take ownership of their physical and mental well-being.
- **Engagement** - Working together, involving and including everyone to continuously improve health and well-being.
- **Toolkits** - Creating best practice tools to inspire and motivate positive and healthy people and workplaces.



## Health and safety culture

Our commitment to achieving zero harm for all individuals impacted by our operations, including our employees, contractors and visitors, remains our health and safety goal. To realise this objective, we established Vision Zero, a strategy emphasising leadership, engagement, safe work environments, processes and a shift towards developing a safety-oriented culture, behaviours and mindset.

### Vision Zero Health & Safety

Continuous year-on-year reduction of our Accident Frequency Rate (AFR) is a core part of our ambition and in the reporting period, we recorded an employee Lost Time Accident (LTA) frequency rate of 1.87, representing a 2.5 per cent increase compared to the previous year. Corrective actions have been implemented to address this increase.

### Leadership

Leadership behaviour is critical to engagement and is the central theme of our site leader health and safety on-boarding programme. Engaged leaders positively impact our health and safety employee engagement index.

### Engagement

Engaged employees proactively identify and eliminate risk, driving a resilient and interdependent culture. We consistently see that when engagement increases, accidents decrease. The health and safety engagement index measures the rate of participation in risk identification and elimination activities. In the reporting period, the index has increased by 34 per cent.

### Processes

Health and safety processes are essential for a safe working environment. Processes on-site include health and safety audits, aimed at driving continuous improvements and accelerating the implementation of our global health and safety standards. Our global health and safety standards are driven through our Health & Safety networks and include working at heights, machine guarding and workplace transport.

### Culture

We believe that our pursuit of Vision Zero has been instrumental in creating a safe and healthy workplace. Our focus on leadership, engagement and processes develops and drives an interdependent safety culture in which every person in the business is safety conscious and will work hard to recognise and remove risk.



## Thermal stress

During the reporting period, we introduced the Group Health & Safety Standard on Thermal Stress, setting out clear guidance and controls to mitigate the risks associated with working in extreme temperatures, both in summer and winter. This standard strengthened our summer preparedness, enabling sites to implement more effective measures to safeguard employee well-being.

**“The European Works Council (EWC) discussed and agreed with senior management and the Group Health & Safety Director that something had to be done to alleviate the effects colleagues were feeling from the extreme heatwaves during the summer months throughout Europe.**

**The result was the Thermal Stress Standard, that we have in place today. This Standard is the result of coordinated work between the EWC and senior management and is a perfect example of what can be achieved when we work together to improve the health and well-being of our colleagues.”**

**Joseph B. Reed**  
European Works Council Chairman

## Managing health and safety

All employees and third parties, including contractors and visitors, are required to always adhere to our health and safety policies and procedures, including emergency action plans, at all our sites. Manufacturing sites have a Health and Safety Committee, composed of both management and employee representatives, as per our internal standards and in compliance with local laws.

### Audits

All our operational sites are subject to regular internal and external audits, which identify risks and drive health and safety improvements.

### Management systems

All our sites maintain health and safety management systems. These are certified to ISO 45001 at 33 per cent of our sites and 66 per cent of our mills.

### Performance management

Our long-term target is zero accidents (Vision Zero). Accidents are investigated and the findings are circulated throughout the business as appropriate. Our sites report monthly performance with reactive and proactive KPIs, such as the health and safety engagement rate.

### Risk and hazard assessment

We aim to continuously improve proactive mitigation and strive to control hazards using a risk-based approach, with a hierarchy of measures. Any observations or raised concerns are addressed openly and promptly.

### Training

We provide comprehensive information, instruction, training and supervision. Our aim is that 100 per cent of employees and third parties undertake some form of required health and safety training, depending on the activities they are required to carry out. We have issued a range of internal Group minimum standards, covering topics such as handling chemicals, lifting equipment and spills.



# Developing our people

Our talent and learning agenda is focused on:

1. **Ensuring we have the capabilities that will underpin our growth agenda**
2. **Ensuring the right level of skills and performance**
3. **Strengthening succession**

Management capability is central to the achievement of our people strategy. Our DS Smith Management Standards outline a clear and consistent set of accountabilities, and we embed these into all of our people processes and the continued roll out of our management development programmes.

Each of our Operations Learning, Sales, Marketing and Innovation (SMI), Finance and Data & Digital Academies have delivered learning, expanding their coverage. During the reporting period, our Operations Learning Academy deployed over 750 hours of training to over 660 employees and our SMI Academy deployed over 2,800 hours of learning interventions.

We also continued to develop our learning platform, adding new content inclusive of 'AI Simulation' which engages users effectively, allowing them to test new skills in a safe environment. To date, we have seen 302 employees engage with 598 'AI Simulations.'

A new 'Skills Benchmarking' feature launched that allows employees to input their job roles for tailored e-learning resources and aspirational roles supporting their development and next step. This comprehensive feature has facilitated 1,040 benchmarks to 436 employees. In total, we delivered 38 hours per employee in the reporting period.

Our Aspire programme, which targets current managers with the potential to be future leaders, has been strategically paused, allowing us to review the quality of training delivered and its impact on our business. Of the six cohorts, we saw 176 employees from 24 countries complete the Aspire journey, with a running retention rate of 78 per cent. Through surveying the line managers, as well as the alumni members, we have found 77 per cent of line managers saw significant change and growth in the participants, with 64 per cent feeling the broadened network improved performance.

Early careers continue to be critical to our succession strategy. Our internal programme, Compass, is targeted at developing employees earlier in their career, and is now training its third cohort. Of the first two cohorts there have been 53 attendees from 13 countries. In the 16 months since the pilot launched, we have seen almost a third move into new roles internally.

Apprenticeships and internships are also a fantastic way for us to develop talent internally, as well as for individuals to develop skills and work experience whilst gaining a qualification.

Throughout Europe and North America, we have over 200 apprentices working part time while studying, these placements traditionally run for 12-24 months, and 50 internships which offer project-based workplaces which have a traditionally shorter duration of 3-12 months.

UK apprenticeships are work-based training programmes combining on-the-job training with formal off-the-job learning. We currently have 143 live learners on apprenticeships ranging from engineering to accountancy. In the last 12 months, 54 employees completed apprenticeship programmes, taking our total number to 259 since their introduction in 2017.

Of these completed apprenticeships, 118 have been in leadership and management courses, with a further 53 live learners in this area. Through these apprenticeships we are actively helping to develop current and future leaders within the business, equipping new managers with the skills needed to lead teams.

Following several successful years, we are taking the opportunity to strategically review the current structure and experience of our graduate programmes. This has allowed us to identify areas for improvement and opportunities to streamline certain elements.

Analysing our 2020 to 2022 alumni, we have a current retention rate of 61 per cent on average. Of our 2023 intake, we have seen 26 per cent enter the business early, up 16 per cent in comparison to the 2022 intake.

We currently have 59 graduates attending our two-year personal development programme, and we are keen to promote further cross-divisional and cross-functional experiences to help broaden business understanding and know-how, promoting further innovation and higher productivity. Our 2021 and 2022 intakes have seen 24 per cent placed in cross-divisional/functional roles to date.

## Graduate programme

Our Graduate programme continues to evolve, and recently we have seen an increase in cross-divisional/functional moves following the completion of the programme.

Our 2022 cohort saw three graduates onboard into cross-divisional roles, which has proved incredibly beneficial for both the business and individuals.

### Matthew Raby moved from Recycling to Paper Sourcing

"Changing division was a daunting process. Working on the paper side of the business involves a different knowledge set to Recycling, thus I had a lot to learn.

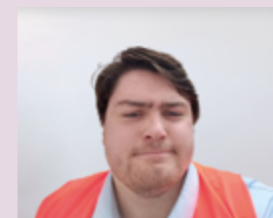
The company culture, taught during the graduate scheme, encouraged us to focus on learned skills. Paper Sourcing is a more international environment than UK Recycling, and the values I learnt as a graduate meant I was confident I would be given the time to learn the technical knowledge required and would receive support if I needed it."

### Mary Philips moved from Packaging to Group IT

"The two roles have many similarities and differences, however, the regional experience provided me with invaluable insights into our operations and cultural differences across the various sites, divisions and functions.

Gaining firsthand experience with the challenges facing the business has allowed me to tailor Learning & Development initiatives to the diverse needs of our workforce.

The networking opportunities during my graduate programme were instrumental in building relationships and gaining exposure to best practices, which benefited me in my current role and I continue to leverage the regional insights I acquired and the connections I formed."



**Matthew Raby**  
PQC Operations Manager



**Mary Philips**  
Digital Learning & Development Advisor

## Paper, Recycling and Capex

The Paper, Recycling and Capex 2023 cohort has seen 6 graduates secure permanent roles in the business before the completion of their graduate programme.

Camilla started as a Business Analyst Graduate within our Turin Recycling Depot in September 2023. During her placement, she demonstrated proactivity and resilience. Camilla took on increased responsibility, delivering work to a high standard and was offered the permanent role in January 2025 - eight months earlier than the planned end date of her two-year graduate programme.

Camilla's manager said "Camilla is a valued member of the team, she was able to develop her network and her business knowledge during the graduate scheme, and she is now able to combine that experience with her analytical skills to produce valuable insight to help in decision making within the business."

This proactive approach ensures that our investment in training and development is maximised, and the organisation can continue to benefit from their skills and knowledge. For the individual, obtaining a permanent position early in their career provides a sense of stability and security. With a permanent role secured, they can focus their energy and efforts on learning, developing their skills and contributing to the organisation without the distraction of seeking employment elsewhere.

Overall, we believe this approach sends a positive message to prospective talent, positioning the company as an attractive employer that values and nurtures its workforce.

"Moving into the business early gave me the opportunity to take on more responsibility, develop faster, and start making a real impact sooner than expected."



**Camilla Carbone**  
Business Analyst Coordinator



# Diversity, equity and inclusion

## Diversity, equity and inclusion

### What do we mean by Diversity, Equity and Inclusion (DEI)?

- **Diversity** is defined as the range of human characteristics within the organisation. This includes, but is not limited to, race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical or mental ability, religious or ethical values systems, national origin and political beliefs. It also includes diverse thinking and neurodiversity.
- **Equity** means providing everyone with what they need to succeed, recognising that not everyone starts from the same place.
- **Inclusion** describes how people feel about their experience at DS Smith, whether they feel it promotes and sustains a sense of belonging.

### The impact of DEI on our leaders and people

Being known as an inclusive organisation will help us to attract and retain, as well as enhance the diversity of the talent we need and deliver our business plan. We will continue to welcome people from different backgrounds and consistently attract some of the best people from our local communities and beyond.

To accelerate progress, we have three immediate focuses:

- Investing in leaders
- Raising awareness through our active networks
- Inclusive people processes



### Investing in leaders

During the reporting period, we worked with Included, a global, impact-driven DEI consultancy, to enable our most senior leaders to become role-models for a more diverse business. We also rolled out a similar internal programme, supported by in-house facilitators who will deliver in local languages to our wider management populations. This programme is intended to provide the cultural awareness and understanding needed to role-model inclusive behaviours and recruit and manage diverse teams. To date, 72 per cent of our leaders have completed this programme, with over 50 per cent in the last 12 months.

For International Women's Day in March 2025, we launched a new Women in Business Network. This is an opportunity for senior leaders to share insights and experience with colleagues, as well as answer questions reflective of current trends and topics. We plan to host these panel discussions three times a year.

### Active networks

Active networks offer a platform for members to openly discuss their experiences and perspectives, leading to greater empathy and understanding throughout our business. They foster a sense of belonging, creating a safe and supportive space for employees who share a common sense of identity.

In 2024, we founded the Veterans Community Network, a place for us to discuss experiences within the armed forces and support each other. The network is inclusive of all armed services as well as family and friends of those who have served and for those that are interested in learning more. Since its launch, the network has amassed 63 members and held four interactive webinars.

Our networks include:

- LGBTQ+ & Allies Network
- Culture & Ethnic Diversity Network
- Gender Diversity Network
- Disability & Allies Network
- Veterans Community Network

The DEI Steering Committee (Steerco), representing the five active networks, meets bi-monthly to enable alignment, collaboration and knowledge-sharing.

With the support of the Talent team and their executive sponsors, the active networks run an annual calendar of awareness-raising events and inclusive communications.

The networks also align with external partnerships and pledges to support their missions. For example, the LGBTQ+ & Allies Network continues to partner with Workplace Pride, and the Culture & Ethnic Diversity Network led the adoption of the Halo Code at key sites in the UK in October 2024.

The networks' contributions are gaining recognition, with one member shortlisted as the DEI Champion of the Year at the 2024 Women in Green Business Awards.

Our DEI site champions continue to work along the active networks and European Works Council (EWC) to increase DEI engagement among non-wired colleagues. For example, our DE&I champions at Lucca Paper Mill introduced a red bench at their site in solidarity of International Day for the Elimination of Violence against Women.

Our Manager's Guide to Diversity, Equity and Inclusion, launched in 2023/24 and translated into 23 languages in 2024/25, supports our manager's understanding of DEI at DS Smith and how to foster a culture of inclusion in their teams. The guide discusses DEI in depth, including a glossary of key DEI terms, guidance on how to lead with inclusion during the recruitment process and tips for creating belonging among teams.

### Inclusive people process

We are actively reviewing our people processes to ensure alignment to our DEI ambition.

We continue to embed our policies through training and awareness campaigns. For example, we launched a refreshed Equal Opportunities, Anti-Discrimination, and Anti-Harassment Policy in the UK alongside an interactive e-learning course, educational videos and engaging handouts.

Ensuring we recruit diverse candidates who can challenge us and drive us forward has enabled our female to male hiring ratio to increase over the last three years.

In 2024/25, we continued to build on the employee brand and careers website, that was refreshed in 2023/24, enabling us to attract the talent we need and provide more visibility of the careers we have to offer.

To drive consistency and standardisation for the hiring process and improve candidate experience across the business we have implemented Workday Recruitment & Onboarding across our European countries. Also, throughout 2024/25, we continued to bring our Talent Acquisition employees together in a forum of continuous improvement.

We have continued to develop and expand our onboarding hub, providing new employees with all the key information, processes, and tools they need as a new starter. Our onboarding experience is designed to ensure new employees feel engaged and are enabled to be productive in their new roles, as quickly as possible.



### Beyond awareness: Moving from fear to action in racial equity

The Culture & Ethnic Diversity Network invited Racial Equity expert, Bernice Hewson, to facilitate an interactive and action-focused session in honour of the International Day for the Elimination of Racial Discrimination. Bernice addressed how to normalise the fear that hinders conversations about race at work, recognise its impact on behaviour, and apply practical tools to navigate racial issues, prompting discussion and reflection from participants.



# Respect human rights

We respect the fundamental human rights of all people, complying with all legal requirements. We have strong policies, procedures and other actions in place to mitigate any potential risks in the following five human rights categories:

## Forced labour and child labour

We have a zero-tolerance approach to forced and/or child labour of any kind within our operations and our supply chain. Our Modern Slavery and Human Trafficking Policy sets our policy for managing modern slavery risk.

## Health and safety

Health and safety is our top priority and we strive for continuous improvement to achieve our target of zero harm. We are committed to advancing the safety of our products and operations to everyone including contractors and site visitors.

## Wages and working hours

We do not employ people below the minimum wage at which the applicable local law permits the relevant work type to be undertaken. We are committed to monitoring and taking action to reduce excessive working hours, and to support flexible working arrangements where possible.

## Freedom of association

It is a fundamental right of employees to have the freedom of association and collective bargaining. We recognise and respect the rights employees have under local and transnational laws, including, where applicable, the right to collective representation and bargaining, with no detriment arising from involvement in legitimate trade union activities.

## Discrimination

Our commitment to human rights protects our people and gives our customers the transparency and visibility they require to help them also identify and manage risk within their own supply chain.

Throughout the reporting period, all our in-scope operational sites (237) completed the Sedex (Supplier Ethical Data Exchange) Self Assessment Questionnaire (SAQ) for the second consecutive year. Upon completion, we have reviewed the Sedex risk management score of all those sites and compared this to last

year's (2023/24) results. We have made an 8-point improvement in our risk rating (lowering our risk). This improvement is a reflection of the actions identified from last year's completion cycle, making a positive impact across our business this year.

Our focus for the year ahead is to continue to embed the annual completion of the Sedex SAQ into business as usual, analyse the outputs to inform our human rights due diligence action plan for the year(s) ahead and undertake further education and training in the importance of Sedex and SMETA (Supplier Member Ethical Trade Audit) within our business to increase awareness and further engagement.

During the reporting period, a total of 23 SMETA were undertaken at our customers' request. We have welcomed the opportunity for our sites to be externally assessed. We are focused on addressing the arising non-conformances to further enhance our human rights due diligence and sharing these insights across the wider business.

## Human rights governance

A multi-disciplinary Modern Slavery and Human Rights Committee steers action and monitors progress, embedding due diligence across the business and supply chain. Reporting to this committee, the working group is responsible for the delivery of our programme of work on human rights.

As a priority, we are working closely with International Paper on updating our policies and related internal procedures to have a combined approach to human rights due diligence.

# 100%

of in-scope sites completed Sedex SAQ<sup>1</sup>

# 0

known human rights breaches<sup>2</sup>

1. The Sedex SAQ is a set of questions relating to labour standards, health and safety, environment and business ethics. The scope includes manufacturing sites.
2. Number of known human rights breaches as a result of our operations, including incidents of violations to the rights of indigenous people.



## We are committed to all fundamental human rights and standards, including:

- The UN Sustainable Development Goals
- The ten principles of the United Nations Global Compact
- The Universal Declaration of Human Rights
- The UN Guiding Principles on Business and Human Rights
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- The United Nations International Convention on the Elimination of All Forms of Racial Discrimination

# Engaging our people and communities

We operate in numerous international communities and therefore have a significant opportunity and responsibility to make a positive, local difference where we operate. We believe a strong Community Programme supports local causes, builds relationships with nearby stakeholder groups, raises the profile of our sites, and engages and motivates our people.

Our Community & Engagement Working Group enables greater visibility on our target progress, to engage sites in community activities each year<sup>1</sup>, and alignment of community activities.

By providing opportunities outside day-to-day roles, our people have the opportunity to serve and contribute to the communities in which they often live and work.

During the reporting period, some sites continued to strengthen relationships with local stakeholders and to develop a recognised and anticipated event in the local calendar by building on activities delivered in previous years in their local community.

Activities during the reporting period included litter clean-ups around the world, presenting the circular economy lesson plan at local schools, creating and donating our products for community events, and workdays in nature reserves to enhance biodiversity.

In line with our Community Engagement and Charitable Donations Policy, we celebrate our local areas and neighbourhoods and make a difference through the three themes of our Community Programme.



## Our community themes

We have an ambitious, Company-wide Community Programme because we believe that as a responsible and sustainable business, investing in the communities where we operate is the right thing to do.

Our sites support a range of causes, often unique and creative ideas in response to the needs of the local communities.

### Our three main strategic themes are:



**Biodiversity**  
Improving the environment for plants and animals, protecting natural habitats and enhancing the diversity of species within the areas in which we operate.



**Education**  
Inspiring and educating our communities and future generations on sustainability and the role of the circular economy.



**Design**  
Using our unique expertise to inspire and stimulate creativity within the community through design and/or offering donations of DS Smith designed products for the benefit of community causes.

## The DS Smith Charitable Foundation

The DS Smith Charitable Foundation was established in 2011 and from its inception has supported a large variety of charitable causes and bodies.

We encourage employee involvement in charitable activities, whether making donations or giving their time and expertise to good causes, and will often support this by complementing employee fund-raising.

During the reporting period, the DS Smith Charitable Foundation announced a \$1 million donation to The Nature Conservancy (TNC). TNC is a global non-profit environmental organisation that has grown to become one of the most effective and wide-reaching environmental organisations in the world. It is committed to conserving one million kilometres of river systems and 30 million hectares of lakes and wetlands to improve the quality and amount of water available to freshwater ecosystems and to communities.

Our grant of \$1 million will focus on three projects in the UK, Croatia and the United States. In the UK, the Norfolk Water Fund will receive a \$390,000 donation, \$540,000 will help protect and restore the Mreznica, Tounjcica and Rjecina Rivers in Croatia, and \$160,000 is earmarked for the Prater's Mill Dam channel realignment project in Georgia, USA.

Sustainability is core to DS Smith's purpose of redefining packaging for a changing world and environmental stewardship is embedded in our Now & Next Sustainability Strategy. In 2024 we made good progress on water management plans and biodiversity programmes at our paper mills and 100 per cent of our in-scope mills and packaging sites now have water management plans. Reusing and recycling water multiple times and through efficient water treatment ensures the safe return to the natural environment to continue the water cycle.

See DS Smith Charitable Foundation for more information



£178K

time contributions

£108K

management costs

£14K

in-kind contributions, including product donations

£710K

cash contributions<sup>2</sup>

£2.4 million

estimated value contributed in 2024/25<sup>3</sup>

345

projects delivered to support local communities

23K

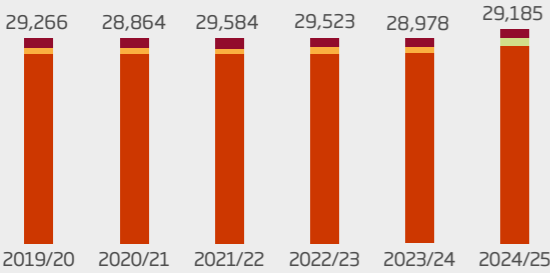
members of our local community engaged

1. Sites with greater than 50 full-time employees.  
2. Includes cash donated by the DS Smith Charitable Foundation.  
3. Estimated using the B4SI Framework – see DS Smith Basis of Preparation 2025 for methodology.



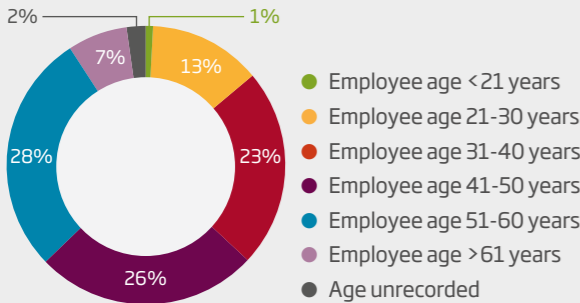
# Social metrics

Total number of employees split by contract type

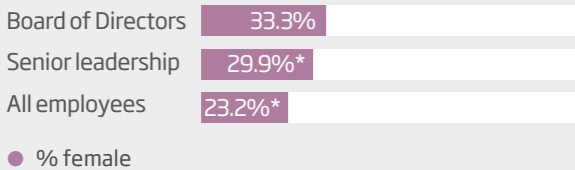


● Full-time contract ● Part-time contract  
● Temporary contract

Employees split by age range (2024/25)



Gender diversity (2024/25) (%)



## Employee demographics

Metric	Unit	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Total number of employees	Number	29,185	28,978	29,523	29,584	28,864	29,266
Full-time contract	Percentage	96.2	92.7	92.4	92.3	92.4	92.4
Part-time contract	Percentage	3.8	3.0	3.0	2.3	2.7	2.7
Temporary contract	Percentage	4.3	4.3	4.6	5.5	4.9	4.9
Employees joining	Number	3926	4,069	5,658	6,667	4,298	4,537
Employees leaving	Number	3,808	4,599	5,034	4,711	3,896	4,435
Resignation/retirement	Percentage	58.48	54	58	63	50	57
Employee turnover <sup>1</sup>	Percentage	13.09	15.72	16.99	16.09	13.39	14.64
Voluntary	Percentage	7.65	8.56	9.83	10.32	6.88	9.03
Length of service >10 years	Percentage	41.1	41.6	42.3	42.6	44.8	45
Employee age <21 years	Percentage	1	1	1	1	1	1
Employee age 21-30 years	Percentage	13	13	14	14	14	14
Employee age 31-40 years	Percentage	23	24	23	23	22	22
Employee age 41-50 years	Percentage	26	26	26	26	26	26
Employee age 51-60 years	Percentage	28	28	28	27	27	27
Employee age >61 years	Percentage	7	6	6	5	5	5
Age unrecorded	Percentage	2	2	2	4	5	5
Employees under collective bargaining agreements	Percentage	64	85	85	85	85	-

## Gender diversity

Metric	Unit	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Board of Directors	% female	33.3	33.3	37.5	37.5	37.5	33.3
Senior leadership	% female	29.9*	31.1*	34.5	31.8	32.4	27.9
All employees	% female	23.2*	23.2*	22.9*	22.5	21.9	21.7
Graduate recruitment	% female	57.6	35	50	64	66.7	25

## UK gender pay reporting

Metric	Unit	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Average (mean) gender pay gap	Percentage	-6.4	-3.8	-2.9	2.2	3.5	4.7
Average (median) gender pay gap	Percentage	-2	-0.2	1.5	6.6	6.2	6.7

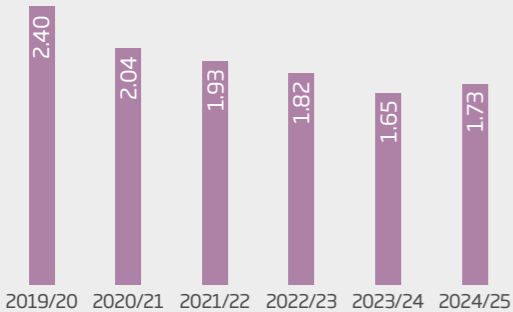
Some historic data may not be given owing to limited coverage.

\* Independent Assurance has been obtained for metrics marked ‘\*’, see the summary statement on page 45.

# Social metrics *continued*

### Accident frequency rate (AFR)

The Accident Frequency Rate (AFR) is the number of lost time accidents (LTAs) per million hours worked.



10%

reduction in employee Lost Time Accidents compared to last reporting year

### Training and career progression

Metric	Unit	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Average hours of training and development	Hours per FTE	38	33	32	26	24	-
Promotions (positions filled by internal candidates)	Number	569	665	696	626	388	427

### Health and safety

Metric	Unit	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Lost time Accidents (LTAs)	Number	97	94	103	110	113	138
Employees	Number	83	80	91	96	101	119
Contractors	Number	14	14	12	14	12	19
Accident Frequency Rate (AFR)	Number	1.73	1.65	1.82	1.93	2.04	2.40
Fatalities	Number	0	0	0	0	0	0
Total Recordable Injury Rate (TRIR)	Number	1.24	1.28	1.46	1.42	1.42	1.96
Lost Time Injury (LTI) Severity Rate	Number	0.13	0.11	0.12	0.11	0.13	0.13



# Governance & Appendices

We are committed to being rigorous in our approach to sustainability, engaging with our stakeholders proactively and designing robust governance over our activities. This commitment is included in our high standards for responsible and ethical business and sourcing.

- In this section
- Materiality and governance
- Stakeholder engagement
- Responsible business
- Governance metrics
- Global Reporting Initiative (GRI) content index
- SASB Standards Index (Containers & Packaging)
- Glossary



# Materiality and governance

## Materiality

As part of our commitment to sustainability, DS Smith has taken considerable steps to prepare for evolving reporting requirements, laying a strong foundation for transparency and accountability. We believe these efforts have positioned us well as we integrate into International Paper.

In 2025, we plan to build on this work by analysing and consolidating our sustainability data and roadmaps with International Paper. This will support the development of a new, unified sustainability framework that reflects the scale, priorities and ambitions of the combined company.

Sustainability is a core strength of the newly combined company, and we remain deeply committed to addressing today's environmental challenges while preparing for those that lie ahead.

In 2022/23 we conducted a materiality assessment, adopting a 'double materiality' approach, capturing both 'impact' and 'financial' materiality. This meant that the impacts our business has on people and the environment ('inside-out') alongside the impacts that people and the environment have on the business ('outside-in'), were evaluated.

The materiality assessment process was facilitated by the Sustainability team, working with an independent third party, which engaged with various internal and external stakeholders, including employees, suppliers and customers. They worked to identify sustainability-related impacts, risks and opportunities (IROs), ensuring that our Now & Next Sustainability Strategy fitted with the priorities of our stakeholders, enabling us to develop our strategy and leverage our resources in prioritised areas.

The assessment concluded that the circular economy and climate change should remain our top priorities, being of critical importance for both the business and for people and the environment. Biodiversity and the regeneration of nature emerged as nascent topics that had increased in importance, and health and safety, diversity and inclusion and human rights were also identified as important.

## Management roles and responsibilities

The governance structure and processes described in this section were in place prior to the closing of the acquisition. Following the close, the combined company is actively re-evaluating its governance framework to ensure continued alignment with its evolving sustainability priorities.

During the reporting period, sustainability-related matters were discussed every month at the Group Health, Safety, Environment and Sustainability Committee and every two months at the Group Strategy Committee. Committees, such as the Group Compliance Committee, maintain oversight of sustainability-related risks and opportunities to the extent to which they relate to material compliance matters.

Four Steering Committees, aligned to the Now & Next Sustainability Strategy, were responsible for maintaining a portfolio of projects to coordinate delivery and resources and propose solutions to critical trade-offs. A dedicated sustainability delivery team drive delivery of the improvements required to meet our targets across the business.

Thematic working groups, which include subject matter experts, provide input, interfacing with internal functions, such as Sales, Marketing and Innovation (SMI), Procurement, Finance and Legal.

Governance includes formalised terms of reference, clear objectives and regular reporting, at least quarterly, to the Group Health, Safety, Environment and Sustainability Committee.





# Stakeholder engagement

## Dialogue with our stakeholders

Our strategic goals are aligned with the expectations of our stakeholders, so that we are delivering for all. Stakeholder engagement is an essential building block of our Now & Next Sustainability Strategy and wider business activities and engagements. During the reporting period, we maintained ongoing dialogue with a range of stakeholders, listening to them in order to shape our priorities. This includes our double materiality assessment, which involves consultation with a wide range of stakeholders, explained further on page 38.

Over this page and the next, examples of engagement with our stakeholders during the reporting period on sustainability and ESG topics are given.

Stakeholder	Who we engaged with	What they told us	What we did
Customers	<p>Our customers are predominantly large, global fast moving consumer goods (FMCG) brands that typically sell goods in supermarkets and via e-commerce channels.</p> <p>We produce corrugated recyclable packaging for these brands and sell paper and recycling materials to third parties.</p> <p>We equip our Sales, Marketing and Innovation teams to be able to support our customers with their sustainability challenges.</p>	<p>Customers are concerned about sustainability, particularly the circularity, including recyclability, and the carbon footprint of their packaging.</p> <p>They are interested in supply chain transparency, legal and regulatory compliance, and competitive pricing, in addition to product quality and meeting their sustainability goals.</p>	<p>We aim to delight our customers, from understanding their needs and responding to sustainability data requests, to providing innovative solutions through long-term strategic partnerships.</p> <p>We continue to bring new solutions to market, increasing recyclability, and reducing the carbon footprint using our Circular Design Metrics and designing with our Circular Design Principles.</p>
Investors	<p>We engage with many of our largest shareholders, as well as some smaller shareholders, on topical issues of particular interest to them.</p> <p>Following completion of the acquisition, our shares are now traded on the New York Stock Exchange under the trading symbol IP and on the London Stock Exchange under the trading symbol IPC.</p> <p>We raise our debt from banks and listed bonds. Our equity and bonds are owned by a diverse range of investors in the UK, Europe, USA and beyond.</p>	<p>Investors are interested in our financial, operational and ESG performance, alongside our Sustainability Strategy, risks and opportunities. They follow our ratings, legal compliance and industrial relations.</p> <p>Investors expect to see honest and transparent communication, primarily focused on carbon, forestry and water and the opportunities for DS Smith with sustainability as a growth driver across the packaging industry.</p>	<p>We engaged with investors and analysts through regular meetings and conferences, including our last Annual General Meeting (AGM), held on 3 September 2024, and engage with our banking syndicate, fixed income investors and ratings agencies periodically. We aim to provide long-term value creation that benefits all of our stakeholders.</p> <p>We continue to showcase our latest circular packaging innovations, improve our performance in ESG ratings and provide analysts with non-financial information.</p>
Employees	<p>During the reporting period, DS Smith employed c. 29,000 employees working across 34 countries in Europe and North America, speaking 26 languages.</p> <p>We are working to realise the potential of our people, focusing on creating a safe, diverse and inclusive workforce, as a fundamental foundation for a successful company.</p> <p>We involve colleagues in not only delivering but also making our sustainability plans, drawing on key expertise and skills from across the business both internally and through the European Works Council.</p>	<p>Our people want to work for a purpose-led organisation that resonates, making them feel proud of their employer, where their personal values are reflected in their workplace, and they can make a real impact and a difference in their job.</p> <p>They contribute to a supportive culture, in which they feel safe, recognised and rewarded.</p>	<p>We are committed to ensuring that our workplace is safe, diverse and inclusive. By giving everyone a voice, we promote a meritocracy with development opportunities for all, and recognition of achievement regardless of gender, ethnicity, age or religion. We encourage feedback through our Employee Works Councils (EWC) and regular employee pulse surveys, which inform local action plans and sharing of best practice, and celebrate successes with our Smithies awards. In 2023/24 we launched and supported Employee Resource Groups (ERGs) to open up involvement and encourage action.</p>



# Stakeholder engagement *continued*

Stakeholder	Who we engaged with	What they told us	What we did
Suppliers	<p>Our suppliers range from large, strategic suppliers, with whom we have long-term, mutually cooperative relationships with mutual commitment where significant and ongoing value is accrued to both parties through operational capabilities, to small suppliers of specialist goods and services for specific requirements. Our diverse supplier population increases our resilience, helping to ensure security of supply.</p>	<p>Suppliers are concerned about legal compliance, competitive pricing and sustainability.</p> <p>Suppliers want to know how they can support us in delivering our sustainability plans through the products and services we purchase from them. Suppliers want to know our standards and expectations of them, particularly in reducing emissions to reach Net Zero.</p> <p>Suppliers are also crucial for supply chain information regarding Scope 3 emissions, EUDR and other regulations.</p>	<p>We collaborated closely with our suppliers, including:</p> <ul style="list-style-type: none"><li>• Communicating our minimum supplier standards in our Global Supplier Standard, assessing supplier sustainability performance and helping them to improve</li><li>• Identifying opportunities to collaborate and work in partnership towards tackling common sustainability challenges</li><li>• Encouraging our suppliers to set their own science-based targets, utilising platforms such as CDP and the Supplier Leadership on Climate Transition Initiative, as part of our commitment to encourage 100 per cent of our strategic suppliers to set their own science-based targets by 2027</li><li>• Engaging with a high number of the suppliers to explain the roles that they have in our supply chain and how they can support us in our EUDR compliance journey</li></ul> <p>We develop mutually cooperative, beneficial relationships that create value for all.</p>
Regulators and policy makers	<ul style="list-style-type: none"><li>• European Commission and Parliament representatives</li><li>• Country level government representatives, e.g. UK Government, Members of Parliament, ambassadors</li><li>• Policy advisors and researchers</li><li>• Local government representatives, e.g. mayors, councillors</li></ul>	<p>The primary focus of regulators and policy makers has been on:</p> <ul style="list-style-type: none"><li>• Climate change</li><li>• Plastic packaging</li><li>• Waste</li><li>• Eco-design</li><li>• EPR (Extended Producer Responsibility)</li></ul>	<ul style="list-style-type: none"><li>• Met with MPs about our local operations and relevant developments, e.g. energy security and supply, raw materials (such as starch) and external events and the impact on supply chains</li><li>• Engaged on climate topics, including Net Zero</li><li>• Responded to a range of government consultations, typically through industry associations</li></ul>
Media, consultancy and education	<ul style="list-style-type: none"><li>• Ipsos Mori</li><li>• Key financial, business and consumer affairs journalists including The Daily Telegraph, The Guardian, The Financial Times, The Financial Mail on Sunday, The Times, CNBC, BBC Today Programme</li><li>• We have worked with research organisations such as Opinium to source consumer research and partnered with White Space to create a report into the state of recycling across Europe</li><li>• YouGov</li><li>• University of Leeds and others</li><li>• University of Georgia (UGA), USA</li></ul>	<p>Our interactions with media and consultants have been focused on:</p> <ul style="list-style-type: none"><li>• Trends in recycling</li><li>• The role of fibre-based packaging at key seasonal moments</li><li>• Damages and supply chain optimisation at key seasonal moments</li><li>• Innovations in plastic replacement, and e-commerce</li></ul> <p>Our partnership with the students at UGA has provided us with invaluable information about the biodiversity existing in our forests and how to effectively manage it.</p>	<p>Our campaigns and research during the reporting year focused on:</p> <ul style="list-style-type: none"><li>• Designing out plastics and highlighting the role of innovation in support of sustainable, fibre-based packaging</li><li>• Highlighting the need for consistency of collections and improved recycling infrastructure</li><li>• Collaborating with industry to support the Packaging and Packaging Waste Regulation in its intended goal of reducing single-use plastic</li><li>• Educating and supporting on consumer recycling behaviours in peak seasonal moments</li><li>• We are engaging with undergraduate and graduate students who have developed projects in our forest lands, focusing on species of interest such as gopher tortoises.</li></ul>



# Stakeholder engagement *continued*

Stakeholder	Who we engaged with	What they told us	What we did
<b>Trade associations and industry bodies</b>	<ul style="list-style-type: none"><li>• FEFCO (European Federation of Corrugated Board Manufacturers)</li><li>• Cepi (Confederation of European Paper Industries)</li><li>• EUROOPEN (The European Organisation for Packaging and the Environment)</li><li>• 4evergreen</li><li>• National trade associations, including:<ul style="list-style-type: none"><li>• CPI (The Confederation of Paper Industries)</li><li>• The Packaging Federation</li><li>• WRAP (Waste and Resources Action Programme)</li><li>• BPF (British Plastics Federation)</li><li>• FCCG (Food Contact Coordination Group)</li></ul></li></ul>	<p>Driven by government and policy makers, trade associations have been focused on regulatory developments around:</p> <ul style="list-style-type: none"><li>• Plastic</li><li>• Waste</li><li>• Recyclability</li><li>• Eco-design</li><li>• Food contact</li><li>• Carbon</li><li>• Awareness of the benefits of corrugated packaging</li><li>• Implications of the above on product design</li></ul>	<p>Technical experts across our business were involved in the following:</p> <ul style="list-style-type: none"><li>• 4evergreen, a cross-industry initiative to drive the recycling rate of paper products in Europe to 90 per cent by 2030</li><li>• Input into legislative processes, e.g. around eco-design for e-commerce packaging</li><li>• Food contact matters</li></ul>
<b>Non-governmental organisations and charities</b>	<p>Our government and NGO engagement is both direct and indirect, through trade associations. We aim to influence change to create a favourable landscape for our Company and stakeholders.</p> <p>For example:</p> <ul style="list-style-type: none"><li>• Ellen MacArthur Foundation</li><li>• Forest Stewardship Council</li><li>• NGO partners in various projects</li><li>• Charities near our sites</li><li>• Charities supported by the DS Smith Charitable Foundation</li><li>• IFRS ISSB (International Sustainability Standards Board)</li></ul>	<p>Governments and NGOs want to engage in collaborative partnerships with the private sector, leveraging resources and building capacity to address systemic issues, particularly those impacting our industry.</p> <p>For example:</p> <ul style="list-style-type: none"><li>• Organisations such as the Ellen MacArthur Foundation tell us what we're doing well and what we could do better in their area of expertise</li><li>• Charities tell us about local needs and how DS Smith can help drive biodiversity and education for the circular economy</li><li>• The ISSB sets standards to guide the disclosure of financially material sustainability information to investors</li></ul>	<p>We engaged in consultations relating to our policy priorities – decarbonisation of heat, reuse and recycling, and extended producer responsibility. We take a leadership role with non-governmental organisations, such as:</p> <ul style="list-style-type: none"><li>• Continuing our strategic partnership with the Ellen MacArthur Foundation</li><li>• Becoming involved in a variety of local community groups to improve and enhance the communities in which we operate</li><li>• Participating in the Technical Reference Group (TRG) to contribute to the technical development of the new IFRS Sustainability Disclosure Standards</li></ul>
<b>Nature</b>	<p>Our circular business model is dependent on the provision of natural resources and ecosystem services from a flourishing natural world. For example, although we recycle packaging, fibre is required as the primary raw material and as a renewable fuel, in the form of biomass. Water is a crucial natural resource used to transport fibres through the process and as a conduit of energy in the form of steam.</p>	<p>Alongside rapid decarbonisation, the climate must be stabilised, limiting nature loss by preserving and regenerating resources, such as land, soil and water. This needs to be achieved in accordance with scientific research and by implementing management practices that regenerate nature.</p>	<p>We have launched biodiversity projects and programmes in our communities. We are assessing our dependencies on nature, and we are investigating setting targets to regenerate nature.</p> <p>This builds on our sustainable forest management practices and paper sourcing certifications.</p>
<b>Communities</b>	<p>Our communities are spread across Europe and North America, often in industrial areas, as well as the towns and cities in which our employees live. Our community engagement aims to produce prosperity, particularly to promote sustainable development and ensure our activities create positive local impacts.</p>	<p>Our communities want to reside amongst a good neighbour, leveraging our activities in a way that produces environmental, economic and social value that benefits the communities in which we operate.</p>	<p>We engaged with our communities on a range of local issues, including in our Community Programme on three main strategic themes: biodiversity, design and education. The DS Smith Charitable Foundation supports environment, education and humanitarian causes, amongst others.</p>



# Responsible business

## Code of Conduct

Following the acquisition, DS Smith is now a wholly-owned subsidiary of International Paper. The policies, procedures and framework described in this section were in place prior to the closing of the acquisition. You can view International Paper's Code of Conduct and other corporate policies at [www.internationalpaper.com](http://www.internationalpaper.com).

Our Code of Conduct, which was in effect until 4 February 2025, describes expectations that apply to all our employees, providing guidance on our approach to ethical business practices, human and labour rights and the environment.

It is made available to employees as part of their induction and has been translated into multiple languages. It is linked to our core values: to be caring, challenging, trusted, responsive and tenacious.

All employees are encouraged to report any suspected misconduct, non-compliance or unethical behaviour.

### Code of Conduct summary

#### Health and safety

Health and safety is our top priority and we actively strive for continuous improvement of health and safety in the workplace.

#### Business practice

All current and potential business partners must be treated fairly and equitably. Employees must act with honesty and integrity in every interaction and comply with all applicable laws. Employees must also always comply with our legal compliance policies, including our Anti-Bribery and Anti-Corruption Policy, our Competition Law Compliance Policy, our Conflicts of Interest Policy and our Document Retention and Personal Data Protection Policies.

#### Human rights

We respect fundamental human rights, and we are committed to the principles set out in the United Nations Universal Declaration of Human Rights. Turn to page 33 for our complete commitment to fundamental human rights standards.

#### Environment

We are committed to running our business in a responsible and sustainable manner.

#### Prevention of tax evasion

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

evasion. We expect anyone performing services for or on our behalf to share our commitment to preventing tax evasion and its facilitation and to ensure this commitment is adopted throughout the provider's supply chain.

#### Employee relations

We are an equal opportunities employer. We are firmly committed to both the principle and realisation of equal opportunities and our policies are designed to provide such equality.

#### Personal development

We aim to develop our employees to fulfil their potential. We promote the alignment of the Group's talent behind the corporate strategy through communication, engagement and effective management.

#### Working transparently

We are committed to conducting all of our affairs with openness and transparency, subject to legal and regulatory restrictions and commercial confidentiality.

#### Community relations

We seek to develop and maintain good relationships in the local communities in which we operate.

## Environmental incidents

During the reporting year, there was one (2023/24: 42) minor environmental incident. There were zero major incidents (defined as incidents of significant impact reportable to local or national authorities, or potentially resulting in legal prosecution and more than £10,000 cost) during the reporting period.

## Water non-conformances

We continue to monitor and take action to mitigate issues of non-conformance with water discharge consents. During the reporting period there was zero notifications of non-conformance with consents to discharge received (2023/24: 3).

A Group minimum standard for effluent management was introduced, setting out standards to ensure compliant operation of waste water treatment plants.

This includes effective compliance monitoring of volumes, flow rates, discharge contents and proactive maintenance and calibration of equipment.

A significant challenge continues relating to inks containing high levels of copper. Some progress has been made in gaining customer acceptance for alternative 'copper-light' inks, which reduce the demand on waste water treatment plants.

## Policies

Policies are an essential part of any organisation, providing a roadmap for day-to-day operations and to ensure compliance with laws and regulations, guiding decision-making and streamlining internal processes.

All of our policies are made available to employees and other stakeholders of DS Smith and are regularly communicated, with mandatory training requirements in many cases. Our policies are regularly reviewed and we remain committed to regular and open dialogue and raising awareness of our policies with our stakeholders.

### Environmental

- Carbon and Energy Efficiency Policy
- Conflict Minerals Policy
- Energy Management System Policy
- Evaluation and Authorisation of Chemicals (REACH) Policy
- Palm Oil Policy
- Sustainable Forest Management and Fibre Policy
- Sourcing Policy
- Water Stewardship Policy
- Zero Waste to Landfill Policy

### Social

- Code of Conduct
- Community Engagement Policy
- Employee Charter
- Global Supplier Standard (GSS)
- Health and Safety Policy Statement
- Human Rights Policy
- Supplier Management Policy

### Governance

- Anti-Bribery and Anti-Corruption Policy
- Anti-Slavery and Human Trafficking Policy (Modern Slavery)
- Code of Conduct
- Commercial Agents Policy
- Competition Law Compliance Policy
- Compliance Framework Policy - ABC & Antitrust
- Confidential Information Policy
- Conflicts of Interest Policy
- Corporate Criminal Offences (Tax Evasion) Compliance Framework Policy
- Document Retention Policy
- Gifts and Hospitality Policy
- Legal Policy
- Personal Data Protection Policy
- Sanctions Policy
- Speak Up! Policy
- Sustainability Data and Reporting Policy

Our public policies can be downloaded from the DS Smith ESG Reporting Hub



# Responsible business *continued*

## Speak Up!

Our ‘Speak Up!’ Policy is communicated to employees using a variety of formats, such as employee handbooks, our intranet and on notice boards.

The Speak Up! Policy encourages employees to ask for advice or raise their concerns internally about unethical behaviour. It also explains the various internal channels available to our staff: reporting via a line manager or local HR, a dedicated internal email address, ‘Speak Up!’ telephone number or website, or reporting via a local representative of the employee.

Concerns about any conduct, behaviour, practice, procedure or policy carried out by any officer or employee of DS Smith or its contractors, suppliers, agents or consultants can be raised through ‘Speak Up!’.

‘Speak Up!’ is available not only to employees, but a range of other third parties. It is supported by an independent, 24/7 telephone number and a website that is available in local languages.

Confidentiality is maintained throughout the whole process and reasonable steps are taken to ensure that the reporter is not subjected to any retaliation from raising the report. In 2024/25, 67 (2023/24: 42) reports were received, investigated and resolved through our ‘Speak Up!’ process.

### ‘Speak Up!’ reports received, investigated and resolved

	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
‘Speak Up!’ reports received, investigated and resolved	67	42	33	50	25	33
Reports relating to alleged HR incidents	52	36	28	45	19	29
Reports relating to alleged H&S incidents	5	3	2	3	5	3
Reports relating to alleged fraud, bribery, corruption or other incidents	10	3	3	2	1	1

### Reporting

In the first instance, problems or concerns should be raised either verbally or in writing with a line manager or alternatively a local HR or an employee representative. There are also multiple ‘Speak Up!’ options available, including a dedicated free phone line or a secure website, both maintained by an independent third party that is under a duty of confidentiality. Alternatively, problems or concerns may be raised via email or letter.

We recognise that proper investigations by suitable skilled managers are an essential part of an effective Speak Up! Policy. Investigations will be conducted by managers of a suitable level of seniority and with a suitable level of skill and experience. Managers will be provided with training on conducting investigations where appropriate.

Following an investigation, if the concern raised is found to be valid, we may make specific findings and take appropriate actions. Sometimes the matter may need to be referred on or further investigation may be needed. For example, referring the matter to the DS Smith General Operating Committee (GOC) with a view to conducting an internal investigation, referring to technical experts or local grievance procedure or the appropriate external regulatory body for further investigation.

### Training

Regulatory compliance training occurs regularly and includes e-learning modules for all DS Smith Group operations worldwide, and all DS Smith Group employees and third parties wherever located. This training covers a variety of compliance modules including antitrust, anti-bribery and corruption, and modern slavery to ensure full understanding of the applicable laws and high standards expected, alongside regular reporting and engagement with senior leadership at divisional level on legal, governance and compliance risk. A record of training undertaken during the reporting period, together with materials presented is maintained by the Legal team.

### Whistleblowing

We encourage openness and will support anyone who raises genuine concerns in good faith under our policies, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.

Implementation of a strong and visual Speak Up! programme across the Group provides a confidential route for employees to report perceived malpractice of any type. As stated in our Speak Up! Policy, DS Smith will take all reasonable steps to ensure all persons raising concerns under this policy and any supporting colleagues or relatives are not subjected to any harassment, victimisation, retaliation, detriment, discrimination or disciplinary action as a result of raising the action.

### Business conduct incidents

DS Smith is committed to investigate business conduct incidents promptly, independently and objectively. A suspected breach or any other matter of concern should be raised with the employee’s manager, local HR or employee representative. If not resolved, concerns can be raised via the ‘Speak Up!’ hotline or website or with senior management.

If applicable, an investigation is carried out by the relevant group function. The outcome of the investigation is reported through established internal channels, and relevant employee(s) and local management are notified.

## Political influence and lobbying activities

No political donations were made in 2024/25 (2023/24: nil).  
DS Smith has a policy of not making donations to political organisations or independent election candidates or incurring political expenditure anywhere in the world, as defined in the Political Parties, Elections and Referendums Act 2000.



# Responsible business *continued*

## Anti-Bribery & Anti-Corruption (ABC)

DS Smith aims to conduct its business in accordance with the highest ethical standards and does not tolerate any form of corruption in any part of its business.

We are committed to complying with applicable anti-corruption laws in all countries in which DS Smith operates and ensuring that opportunities for corruption and bribery are reduced to the lowest practicable level of risk.

The Anti-Bribery & Anti-Corruption (ABC) Policy together with the Compliance Framework Policy Anti-Bribery & Corruption and Anti-Trust sets out the policy on the control of actual and suspected corruption and bribery within DS Smith, and the processes to be followed in the event of an actual or suspected instance of corruption or bribery being discovered.

The ABC Policy and Compliance Framework Policy Anti-Bribery & Corruption and Anti-Trust are available for all employees, customers and stakeholders on our internal intranet and the DS Smith corporate website.

### Risk assessments

As part of their ongoing risk assessment processes and in conjunction with the Risk and Insurance Group, each division must assess and identify those bribery and corruption and anti-trust risks that they encounter in their day to day operations. This will include an assessment of the level of risk associated within the countries in which they operate, and (i) in the context of ABC issues, any interaction with public and government officials and an analysis of typical entertainment and hospitality offered together with an assessment of its use of agents and (ii) in connection with anti-trust issues, any interactions with competitors in that country (including through participation in trade associations) and any potential anti-competitive practices.

The results of these risk assessments must be documented and must be reviewed at least annually by the Divisional CEOs, Divisional Financial Directors and Divisional Legal Directors. This is in order for them to check if any processes or procedures within a business division need to be amended or improved, or enhanced training given in order to better counter the ABC or anti-trust risks faced by such business. Group Internal Audit reviews the risk assessment performed by management to assess and identify the ABC and anti-trust risks faced by the Division, as well as the controls in place to mitigate these.

### Training

We provide online and, where appropriate, in-person training on the risks of engaging in bribery and corruption, and the requirements of the Anti-Bribery & Anti-Corruption Policy (ABC Training), to relevant employees identified by the Legal team on a regular basis. Online training is also part of the induction process for relevant new employees.

All line managers are responsible for ensuring that their direct reports who have been asked to complete ABC training have completed the training and may be asked periodically to confirm this to the Legal team. Line managers should contact the Legal team if they believe additional training is required for any of their direct reports or in their businesses.

Confirmation of compliance with the ABC Policy is also required under the twice-yearly Group policy certification process, which applies to management and certain customer and supplier facing employees identified by the Legal team.

### Training includes, but is not limited to:

- How anti-bribery and corruption legislation may affect employees day-to-day
- The meaning of 'bribery' and 'corruption' in the context of our business
- The UK's Bribery Act 2010, the US's Foreign Corrupt Practices Act 1977
- Day-to-day issues that might arise in the course of our work
- The responsibility we share in ensuring third parties comply with anti-bribery and corruption legislation

### Reporting

A suspected breach or any other matter of concern should be raised with the employee's manager, local HR or employee representative. If not resolved, concerns can be raised with the Company Secretary or Group General Counsel, the 'Speak Up!' hotline or website or with another member of senior management.

If applicable, an investigation, is carried out by the relevant group function and overseen by Group General Counsel. The outcome of the investigation is reported to the Audit Committee, and relevant employee(s) and local management are notified.

As stated in our Speak Up! Policy, DS Smith will take all reasonable steps to ensure all persons raising concerns under this policy and any supporting colleagues or relatives are not subjected to any harassment, victimisation, retaliation, detriment, discrimination or disciplinary action as a result of raising the action. See page 43 for more information on Speak Up!

### Anti-competitive behaviour

As an international business, DS Smith encounters laws and regulations designed to promote fair competition and encourage ethical and legal behaviour.

Anti-trust and fair competition legislation generally prohibits activities that restrain free trade or limit competition.

Prohibited activities include collusion with competitors to fix prices, share markets or allocate customers, and sharing of commercially sensitive information such as pricing and strategy with competitors.

DS Smith is committed to an even playing field in its business dealings and is committed to conducting its business in full compliance with such legislation.

All employees are required to comply with our Competition Law Compliance Policy and to report any suspected breaches. Online competition law compliance training is mandatory for targeted audiences and is supplemented by training from our Legal team.

### Gifts and hospitality

We recognise that the act of giving and accepting gifts can be part of building normal business relationships. Some gifts and hospitality can create improper influence and conflicts of interest. Employees are required to report any circumstances which are in breach of our Gifts and Hospitality Policy.

We do not tolerate any form of corruption and we are committed to complying with applicable anti-bribery and anti-corruption laws in all countries in which we conduct business. All employees are required to report any circumstances that are in breach of our Anti-Bribery and Anti-Corruption Policy. Online Anti-Bribery and Anti-Corruption training is mandatory for targeted audiences and is supplemented by live training provided by our Legal team. Our Anti-Bribery and Anti-Corruption Policy is supplemented by our Conflicts of Interest, Commercial Agents and Gifts & Hospitality Policies.



# Governance metrics

## Sedex SMETA (Supplier Members Ethical Trade Audit) non-conformances

Metric	Unit	2024/25	2023/24 <sup>1</sup>	2022/23	2021/22	2020/21	2019/20
Entitlement to work	Number	4	4	0	2	1	4
Environment	Number	0	4	2	3	3	3
Health, safety and hygiene	Number	51	50	13	15	30	32
Management systems	Number	7	13	2	3	16	4
Regular employment and wages	Number	15	12	4	4	4	8
Working hours	Number	15	16	4	8	3	4
Other	Number	18	12	4	3	1	1

## Management system certifications

Metric	Unit	2024/25	2023/24	2022/23	2021/22
ISO 9001	% of sites	75	71	72	74
ISO 14001	% of sites	61	54	55	56
ISO 50001	% of sites <sup>2</sup>	100	100	100	100
ISO 45001	% of sites	33	33	33	33
FSC®	% of sites <sup>3</sup>	100	100	100	100
PEFC	% of sites	2	2	2	3
SFI	% of sites	2	2	2	2

## Paper certifications<sup>4</sup>

Metric	Unit	2024/25	2023/24	2022/23	2021/22
FSC® Mix	% of papers	5	6	6	7
FSC® Recycled	% of papers	77	76	75	73
FSC® Controlled Wood	% of papers	18	18	19	20

## Responsible sourcing

Metric	Unit	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Suppliers agreed to our supplier standards	% of suppliers	92	90	78	78	45	11
Strategic suppliers agreed to our GSS <sup>5</sup>	% of suppliers	100	100	100	100	100	74
Strategic suppliers assessed on sustainability <sup>6</sup>	Number	100	100	100	100	100	74
Suppliers engaged in improvement plans	Number	31	31	63	68	46	18
Initiated actions to improve performance	Number	99	99	444	330	389	239
Completed actions to improve performance	Number	31	31	222	167	180	139

## Normalisation metrics

Metric	Unit	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20
Total revenue	GBP £ million	6,051	6,822	8,221	7,241	5,976	6,043
Total production	tonnes	9,871,434*	9,874,853*	10,164,657*	11,014,256*	10,445,145	10,222,065
Total employees	FTEs	29,185	28,978	29,523	29,584	28,864	29,266

Some historic data may not be given owing to limited coverage.

\* Independent Assurance has been obtained for the metrics marked with '\*' - see the summary Assurance Statement below.

1. In 2024/25 we saw an increase in the number of non-conformances following the introduction of an updated SMETA framework. The closer scrutiny of our operations provides us with an opportunity to better understand where there is a potential risk within our business and action needed to address it. See page 33 for more information.
2. Scope: Sites accounting for at least 90 per cent of overall Group energy consumption.
3. Scope: Packaging, Paper and Paper Sourcing sites that trade or manufacture products derived from timber.
4. Scope: Papers purchased through our centralised Paper Sourcing platform.
5. Global Supplier Standard (GSS).
6. Assessed on sustainability refers to undertaking the EcoVadis sustainability ratings assessment, or via other means. Improvement plans, initiated actions and completed actions refer to those issued within the EcoVadis platform. We define 'strategic suppliers' as companies with whom we have a long-term, mutually cooperative relationship with mutual commitment where significant and ongoing value is accrued to both parties through operational capabilities. In 2024/25, we categorised 112 of our suppliers as strategic.

### Independent Assurance Statement

Deloitte have provided independent third-party limited assurance in accordance with the International Standard for Assurance Engagements 3000 (ISAE 3000) and Assurance Engagements on Greenhouse Gas Statements (ISAE 3410) issued by the International Auditing and Assurance Standard Board (IAASB) over the selected information, identified with \* in the above table, and other selected information relating to carbon, energy, water, waste, production and employee diversity identified with \* within the DS Smith Sustainability Report 2025.

Deloitte's full unqualified assurance opinions, which include details of the selected information assured in 2024/25, 2023/24, 2022/23 and 2021/22, can be found on our ESG Reporting Hub, at [www.dssmith.com/sustainability/reporting-hub](http://www.dssmith.com/sustainability/reporting-hub)



# Global Reporting Initiative (GRI) content index

The relevant pillars of our Now & Next Sustainability Strategy that correspond to each GRI Standard are stated in the ‘Theme’ column in the table. In the ‘Ref’ column, ‘SR’ refers to this year’s DS Smith Sustainability Report 2025 and ‘NZ’ DS Smith Net Zero Transition Plan 2024, which can be obtained from the ESG Reporting Hub on the DS Smith website.

**Statement of use** DS Smith has reported the information cited in this GRI content index for the period May 2024 – April 2025 with reference to the GRI Standards.

**GRI 1 used** GRI 1: Foundation 2021

Theme	GRI	SDG targets	Ref
<b>GRI 2: General</b> Disclosures 2021	2-1 Organizational details		SR 3, 52
	2-3 Reporting period, frequency and contact point		SR 3, 52
	2-4 Restatements of information		SR 3
	2-5 External assurance		SR 45
	2-6 Activities, value chain and other business relationships		SR 21, 23, 39-41
	2-7 Employees		SR 28-36
	2-9 Governance structure and composition		SR 38
	2-22 Statement on sustainable development strategy		SR 5
	2-23 Policy commitments		SR 3, 42
	2-24 Embedding policy commitments		SR 42-44
	2-26 Mechanisms for seeking advice and raising concerns		SR 43
	2-27 Compliance with laws and regulations		SR 42-44
	2-28 Membership associations		SR 39-41
	2-29 Approach to stakeholder engagement		SR 39-42
	2-30 Collective bargaining agreements		SR 33, 35
<b>GRI 3: Material</b> Topics 2021	3-1 Process to determine material topics		SR 3, 38
	3-3 Management of material topics		SR 6-7, 38, 42-44
Responsible sourcing	GRI 204: Procurement Practices 2016		SR 21, 23, 45
Responsible business	GRI 205: Anti-corruption 2016		SR 44
Responsible business	GRI 206: Anti-competitive Behavior 2016		SR 44

Theme	GRI	SDG targets	Ref
Resource use and circular economy	GRI 301: Materials 2016	8, 4, 12.2, 12.5	SR 22-24
Climate change	GRI 302: Energy 2016	7.2-3, 8.4, 12.2	SR 9-13 NZ 8-16, 26-28
Water and marine resources	GRI 303: Water and Effluents 2018	6.3-4, 12.4	SR 14-17
Biodiversity and ecosystems	GRI 304: Biodiversity 2016	15.1, 15.5	SR 18-21
Climate change	GRI 305: Emissions 2016	3.9, 12.4, 13.1	SR 9-13 NZ 26-28, 33-34
Resource use and circular economy	GRI 306: Waste 2020	12.4, 12.5	SR 24-26
Sustainable procurement	GRI 308: Supplier Environmental Assessment 2016	12, 15	SR 21, 23, 45 NZ 9, 12, 17, 20-24
Own workforce	GRI 401: Employment 2016	5.4, 8.5-6, 10.3	SR 28-36
Own workforce	GRI 402: Labor/Management Relations 2016	8.8	SR 28-36
Own workforce	GRI 403: Occupational Health and Safety 2018	3.3, 8.8	SR 28-30, 36
Own workforce	GRI 404: Training and Education 2016	4.3-5, 8.2, 8.5	SR 31-32, 36
Own workforce	GRI 405: Diversity and Equal Opportunity 2016	5.5, 8.5, 10.3	SR 32, 35
Own workforce	GRI 406: Non-discrimination 2016	5.1, 8.8	SR 32-33
Own workforce	GRI 407: Freedom of Association and Collective Bargaining 2016	8.8	SR 33, 35, 44
Own workforce	GRI 408: Child Labor 2016	8.7	SR 33
Own workforce	GRI 409: Forced or Compulsory Labor 2016	8.7	SR 33
Own workforce	GRI 411: Rights of Indigenous Peoples 2016	2.3	SR 33
Own workforce	GRI 413: Local Communities 2016	2.2-3	SR 34
Sustainable procurement	GRI 414: Supplier Social Assessment 2016	5.2, 8.8, 16.1	SR 21, 45
Stakeholder engagement	GRI 415: Public Policy 2016	16.5	SR 34, 43
Responsible business	GRI 416: Customer Health and Safety 2016	16.3	SR 26

# SASB Standards Index (Containers & Packaging)

This table contains Sustainability Accounting Standards Board (SASB) Containers & Packaging industry standard disclosures. The standard provides investors and other report users with consistent, comparable and reliable ESG information. Disclosures can be located directly in the table, with associated information on the pages referenced. ‘SR’ refers to this year’s DS Smith Sustainability Report 2025 and ‘NZ’ DS Smith Net Zero Transition Plan 2024, which can be obtained from the ESG Reporting Hub on the DS Smith website.

Topic	Accounting metric	Unit	Code	Disclosure	Ref
Greenhouse gas emissions	Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations	tonnes CO <sub>2</sub> e; %	RT-CP-110a.1	1,399,949 *; 70*	SR 10
	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Discussion and analysis	RT-CP-110a.2	Narrative	NZ 12-19
Air quality	Air emissions of the following pollutants: (1) NOx (excluding N <sub>2</sub> O), (2) SOx, (3) volatile organic compounds (VOCs), and (4) particulate matter (PM)	Tonnes	RT-CP-120a.1	2,054; 276; 0; 340	
Energy management	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable, (4) total self-generated energy	MWh; %	RT-CP-130a.1	14,258,793*; 12; 28*; 6,069,936	SR 13
Water management	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	m <sup>3</sup> ; %	RT-CP-140a.1	53,783,405*; 16,824,617*; 29.7*	SR 16-17
	Description of water management risks and discussion of strategies and practices to mitigate those risks	Discussion and analysis	RT-CP-140a.2	Narrative	SR 14-15
	Number of incidents of non-compliance associated with water quality permits, standards, and regulations	Number	RT-CP-140a.3	5	SR 42
Waste management	Amount of hazardous waste generated; percentage recycled	Tonnes; %	RT-CP-150a.1	5,694; 64	SR 25
Product safety	Number of recalls issued; total units recalled	Number	RT-CP-250a.1	0; 0	SR 26
	Discussion of process to identify and manage emerging materials and chemicals of concern	Discussion and analysis	RT-CP-250a.2	Narrative	SR 26
Product life cycle management	Percentage of raw materials from: (1) recycled content, (2) renewable resources, and (3) renewable and recycled content	%	RT-CP-410a.1	82; 100; 100	
	Revenue from products that are reusable, recyclable and/or compostable	£ '000,000	RT-CP-410a.2	6,039	NZ 19
	Discussion of strategies to reduce the environmental impact of packaging throughout its life cycle	Discussion and analysis	RT-CP-410a.3	Narrative	SR 22-24
Supply chain management	Total wood fibre procured, percentage from certified sources	Tonnes; %	RT-CP-430a.1	4,345,603 100	SR 21, 45
	Total aluminium purchased, percentage from certified sources <sup>1</sup>	Tonnes; %	RT-CP-430a.2	Not applicable	

1. We consider this indicator immaterial as we are a purely fibre-based packaging business.



# Glossary

<b>1.5°C-aligned</b>	the target set out in the Paris Agreement to limit global warming to 1.5°C by 2100 compared to pre-industrial levels to avoid the worst impacts of climate change
<b>4evergreen</b>	a cross-industry alliance to foster synergies among companies promoting low-carbon and circular fibre-based packaging
<b>AFR (Accident Frequency Rate)</b>	the number of Lost Time Accidents per million hours worked
<b>Annual Report</b>	a yearly publication to stakeholders, documenting activities and finances in the previous financial year
<b>Biodiversity</b>	the variety of plant and animal life in the world or in a particular habitat, a high level of which is usually considered to be important and desirable
<b>Biodiversity programme</b>	a series of activities to support biodiversity and indicating a long-term (typically 2-3 years) commitment of a DS Smith paper mill, either at a DS Smith site or in the local community
<b>Biodiversity project</b>	a series of activities to support biodiversity and indicating a long-term (typically 2-3 years) commitment of a DS Smith paper mill, within a DS Smith site and/or in the local community
<b>Board</b>	the Board is comprised of Executive and Non-Executive Directors, who are collectively responsible for overseeing and directing our operations, while monitoring the performance of management on behalf of the shareholders
<b>Business models</b>	ways of working, processes and financial models, including technology, consultancy and service offerings
<b>Business travel</b>	business travel of employees for business-related activities (including air, rail, road, and hotel stays )
<b>Carbon intensity per tonne of production</b>	the average GHG emissions arising from the manufacture of producing an average tonne of product

<b>CDP</b>	a not-for-profit charity that runs the global disclosure system for investors, companies, cities, states and regions to manage their environmental impacts
<b>Cepi (Confederation of European Paper Industries)</b>	the European association representing the paper industry
<b>Chain of custody certified papers, minimum controlled wood standard</b>	verification that certified materials and products have been checked at every stage of processing. Controlled wood is wood of known origin with a minimum risk of being harvested in an unacceptable way
<b>CHP (Combined Heat and Power Plant)</b>	the concurrent production of electrical and thermal energy from a single fuel
<b>Circular business</b>	integrated operations designed to generate value by reducing waste and pollution and keeping products and materials in use at their highest value
<b>Circular Design Metrics</b>	a pioneering tool from DS Smith that rates and compares the circularity of packaging designs across eight indicators, giving a clear identification of a packaging design’s sustainability performance, and where to focus attention
<b>Circular Design Principles</b>	a set of principles, developed by DS Smith in collaboration with the Ellen MacArthur Foundation, which guide designers to develop more circular packaging solutions
<b>Circular economy</b>	a systems solution framework that tackles global challenges like climate change, biodiversity loss, waste and pollution. It is based on three principles, driven by design: eliminate waste and pollution; keep products and materials in use; and regenerate natural systems
<b>Circular economy engagement</b>	two-way interaction on topics relating to the circular economy through activities such as e-learning training, newsletters, social media, webinars and other campaigns

<b>Circular lifestyles</b>	day-to-day activities that embrace the principles of designing out waste and pollution, keeping products and materials in use and regenerating natural systems
<b>Circulytics</b>	the most comprehensive circular economy performance measurement tool, available from the Ellen MacArthur Foundation
<b>Climate change</b>	a change in global or regional climate patterns, in particular a change apparent from the mid to late 20 <sup>th</sup> century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels
<b>CO<sub>2</sub>e (Carbon dioxide equivalent)</b>	a unit for measuring different greenhouse gases in a common unit
<b>Community Programme</b>	the voluntary donation of Company resources, employee hours and/or goods and services to support local community or charitable projects in 100 per cent of our sites with 50 or more full time employees
<b>Consent to discharge</b>	permits made available to allow effluents and other water to leave the organisation boundary
<b>CPI (Confederation of Paper Industries)</b>	the leading trade association representing the UK’s paper-based industries
<b>DJSI (see also S&amp;P Global)</b>	the Dow Jones Sustainability Indices (DJSI) are a family of best-in-class benchmarks for investors who have recognised that sustainable business practices are critical to generating long-term shareholder value and who wish to reflect their sustainability convictions in their investment portfolios
<b>Downstream transportation and distribution</b>	third-party transportation and distribution services after the point of sale not purchased by DS Smith
<b>DS Smith Charitable Foundation</b>	a charity supporting causes in the local communities of our operations and that align with the primary objectives of protecting our environment and providing educational opportunities

<b>EcoVadis</b>	the world’s largest and most trusted provider of business sustainability ratings, creating a global network of more than 90,000 rated companies
<b>Ellen MacArthur Foundation (EMF)</b>	the Ellen MacArthur Foundation works to accelerate the transition to a circular economy, developing and promoting the idea of a circular economy, and working with business, academia, policymakers and institutions to mobilise systems solutions at scale, globally
<b>Employee commuting</b>	transportation of employees between their homes and work sites
<b>End-of-life treatment of sold products</b>	the expected waste disposal and treatment of sold products at the end of their life
<b>Energy export</b>	process of flowing energy that leaves our organisation boundary to a third party
<b>Energy generation</b>	process of producing energy from a primary fuel or energy source
<b>Environmental incident</b>	an event or occurrence relating to the natural world
<b>EPR (Extended Producer Responsibility)</b>	a policy approach under which producers are given a significant responsibility for the treatment or disposal of post-consumer products
<b>ESG (Environmental, Social, Governance)</b>	standards relating to sustainability for an organisation’s operations
<b>ESG Databook</b>	a publication to stakeholders, documenting non-financial performance in the previous and historic financial years
<b>ESG rating</b>	a measurement of performance on ESG standards
<b>EUDR (European Union Deforestation Regulation)</b>	a European Union law with the aim to combat deforestation and forest degradation by ensuring that products placed and made available on or exported from the EU market have not caused damage to forests

# Glossary *continued*

<b>FEFCO</b>	European Federation of Corrugated Board Manufacturers, Europe’s corrugated packaging association
<b>Fibre</b>	natural cellulose material used to make paper
<b>Fibre optimisation</b>	a process in which supply chain data is used to predict and calculate the exact performance requirement of packaging
<b>Forest management certification</b>	a mechanism for verifying that a forest is managed responsibly to the requirements of a standard to promote the sustainable management of forests
<b>Fossil fuel</b>	a non-renewable energy source formed from decomposition of carbon-based organisms that release carbon dioxide when burned, contributing to climate change
<b>FSC® (Forest Stewardship Council®)</b>	an international non-profit that promotes responsible management of the world’s forests. For our FSC certification, we include Packaging, Paper and Paper Sourcing sites that trade or manufacture products derived from timber
<b>Fuel- and energy-related activities</b>	emissions arising from the extraction, production, and transportation of fuels and energy purchased
<b>GHG (greenhouse gas)</b>	a gas that contributes to climate change by absorbing infrared radiation
<b>GOC (Group Operating Committee)</b>	the Group Chief Executive’s management board for considering Group-wide initiatives and priorities  In effect through 4 February 2025
<b>Greenhouse Gas Protocol</b>	a comprehensive framework to measure greenhouse gas (GHG) emissions
<b>GRI (Global Reporting Initiative)</b>	an international independent standards organisation that helps businesses, governments and other organisations understand and communicate their impacts on issues such as climate change, human rights and corruption

<b>Group</b>	DS Smith Plc, which, has since been re-registered as DS Smith Ltd., a wholly-owned subsidiary of International Paper Company
<b>GSS (Global Supplier Standards)</b>	a document that communicates the minimum standards that every supplier of materials and/or services to DS Smith is expected to meet
<b>Hard-to-recycle packaging</b>	packaging that is not presently recycled at scale in common waste streams
<b>HSES (Health, Safety, Environment and Sustainability) Committee</b>	a sub-committee of the GOC for considering Group-wide health, safety, environment and sustainability matters
<b>ISO (International Organization for Standardization)</b>	an international standard development organisation that publishes standards, e.g. ISO 9001, 14001, 45001, 50001. For our Group-wide ISO 50001:2018 certification, we include sites accounting for at least 90 per cent of overall Group energy consumption
<b>Linear economy</b>	an economy in which finite resources are extracted to make products that are used, generally not to their full potential, and then thrown away
<b>LTA (Lost Time Accident)</b>	an accident resulting in lost time of one shift or more
<b>LTI (Lost Time Injury)</b>	an injury resulting in lost time of one shift or more
<b>Major environmental incident</b>	an environmental incident of significant impact reportable to local or national authorities, or potentially resulting in legal prosecution and > £10,000 cost
<b>MSCI (Morgan Stanley Capital International)</b>	a global investment research firm with an ESG rating model to identify ESG risks that are most material to a sector and recognise companies managing most significant ESG risks and opportunities relative to industry peers
<b>Net positive recycler</b>	an organisation, such as DS Smith, that manages more material for recycling than packaging sold

<b>Net Zero</b>	the state of reaching a balance between the amount of greenhouse gas produced and taken out of the atmosphere resulting in no net impact on the climate from greenhouse gas emissions to limit global temperature rise
<b>Net Zero Transition Plan</b>	a time-bound roadmap of decarbonisation activities to reach Net Zero, with defined targets and actions
<b>NGO (Non-governmental organisation)</b>	a not-for-profit organisation that operates independently of any government
<b>Optimise (packaging solutions)</b>	predicting the most effective performance requirement of a packaging solution using supply chain data
<b>Packaging solutions</b>	fibre-based packaging products that are designed to address customer and consumer needs and maximise sustainable performance
<b>Paper products</b>	fibre-based paper products that are designed to address customer and consumer needs and maximise sustainable performance, made from 100 per cent recycled or chain of custody certified fibres
<b>PEFC (Programme for the Endorsement of Forest Certification)</b>	an international NGO which promotes sustainable forest management through independent third-party certification
<b>Post-consumer waste</b>	recovered fibre originated from end-consumer material streams, such as household waste or in back-of-store collections
<b>Pre-consumer waste</b>	recovered fibre originated from manufacturing scrap material streams, such as trimmings and off-cuts
<b>Problem plastics</b>	any plastic with a low recycling rate compared to paper and cardboard or not made from renewable resources
<b>Processing of sold products</b>	further transformation before use by the end consumer of sold intermediate products by third parties (e.g. other manufacturers)

<b>Production</b>	sum of net saleable production (output) from our three main operations: Packaging, Paper and Recycling, that is sold to internal and external customers. This includes Packaging (boxes, sheets and other), Paper reels (and other), Wood products (sold by our Timber business) and recovered fibre and other materials (e.g. glass, metals, plastic and wood) processed and sold through our Recycling depot network
<b>Pulp</b>	a lignocellulosic fibrous material used in papermaking that is prepared by separating cellulose fibres from wood
<b>Purchased goods and services</b>	upstream activities (i.e. cradle-to-gate) relating to the production of all tangible and intangible products purchased or acquired
<b>Raw materials</b>	basic materials used to manufacture a product, such as pulp or starch
<b>Recovered fibre</b>	used fibrous material that is collected for recycling and used again as a raw material for papermaking
<b>Recyclable</b>	a material that can be collected, separated or recovered from the waste stream through an established programme; whereby >95 per cent of the total packaging weight is accepted by and processed in paper mills as per CPI recyclability guidelines
<b>Recycled or reused packaging</b>	packaging recycled in practice and at scale or packaging designed to accomplish a minimum of two trips or rotations within its life cycle
<b>Recycled paper</b>	paper made from recycled materials
<b>Renewable fuel</b>	fuels produced from renewable natural resources, such as biogas, biomass and biomethane
<b>Reporting period</b>	the span of time the report covers, which in this report is from 1 May 2024 to 30 April 2025



# Glossary *continued*

<b>Responsible fibre sourcing</b>	an approach to purchasing and supply chains that actively and consciously sources and procures fibre for operations in an ethical, sustainable and socially responsible way, using for example only recycled or chain-of-custody certified papers
<b>Reusable</b>	packaging designed to accomplish a minimum of two trips or rotations within its life cycle
<b>Reuse pilot</b>	a project in a real-world environment with a customer and/or partner(s) to test reusable packaging innovations and business models as appropriate. Successful pilots have the potential to scale to other customers and markets through DS Smith's Innovation stage gate process
<b>S&amp;P Global</b>	see 'DJSI'
<b>SBT (science based target), SBTi (Science-Based Targets initiative)</b>	a carbon reduction target that reflects an emissions reduction in line with climate science, as promoted by the SBTi, an NGO which drives ambitious climate action in the private sector
<b>Scope 1 (direct) GHG emissions</b>	greenhouse gas emissions arising from the combustion of fuels in assets owned by the Company (e.g. emissions from owned boilers, furnaces, vehicles, etc)
<b>Scope 2 (indirect) GHG emissions</b>	greenhouse gas emissions arising from the generation of purchased electricity, heat, steam or cooling, which physically occur at the facility where the energy is generated
<b>Scope 3 (indirect) GHG emissions</b>	greenhouse gas emissions arising in the value chain from all other sources as a consequence of our activities but from sources not owned by the Company
<b>SFI (Sustainable Forestry Initiative)</b>	a sustainability organisation operating in the US and Canada that works to advance sustainability through forest-focused collaboration

<b>SMETA (Sedex Members Ethical Trade Audit)</b>	a social auditing methodology, enabling businesses to assess their site and suppliers to understand working conditions in their supply chain
<b>'Speak Up!'</b>	an independent confidential process for asking for advice or raising concerns about unethical behaviour
<b>Strategic supplier</b>	a long-term, mutually cooperative relationship with mutual commitment where significant and ongoing value is accrued to both parties through operational capabilities
<b>Supplier standards</b>	see GSS (Global Supplier Standards)
<b>Sustainability</b>	the ability to meet the needs of the present without compromising the ability of future generations to meet their own needs
<b>SUS LT</b>	Sustainability Leadership Team
<b>Sustainalytics</b>	a global leading ESG research and data firm that rates the sustainability of companies based on ESG performance
<b>T NSP</b>	(metric) tonne net saleable production
<b>TCFD (Task Force on Climate-related Financial Disclosures)</b>	a framework developed to help public companies and other organisations disclose climate-related risks and opportunities
<b>TNFD (Taskforce on Nature-related Financial Disclosures)</b>	a nature-related risk-management and disclosure framework
<b>Traded waste</b>	waste that is acquired and sold but does not physically enter the boundary of a DS Smith recycling depot
<b>Upstream transportation and distribution</b>	third-party transportation and distribution services between tier 1 suppliers and own operations; and outbound transportation services purchased by DS Smith
<b>Virgin fibre</b>	natural fibre used to make paper that has not yet been recycled

<b>Vision Zero</b>	our campaign to strive towards a workplace without accidents and illness through an approach to prevention that improves the health, safety and well-being of employees
<b>Waste collected for recycling</b>	used paper and cardboard for recycling that is acquired and physically enters the boundary of a DS Smith site (i.e. excludes 'traded waste')
<b>Waste generated in operations</b>	third-party disposal and treatment of waste from own operations, such as reject non-fibre material that enters our circular business model
<b>Water consumption</b>	total water withdrawals that are not discharged back into the water environment or to a third party
<b>Water discharge</b>	total water effluents and other water leaving the boundary and released into the natural environment
<b>Water efficiency</b>	efficiency from which production is realised from water as a natural resource. As a calculation, this is water withdrawal divided by production
<b>Water stress</b>	the World Resources Institute (WRI) definition is 'an indicator of competition for water resources that is defined informally as the ratio of demand for water by human society divided by available water '
<b>Water stress mitigation plan</b>	a risk management plan to mitigate water stress risk implemented at 100 per cent of our sites identified as at risk of water stress by the WRI Aqueduct Water Risk Atlas tool
<b>Water withdrawal</b>	total water withdrawn into the boundary from all sources for any use
<b>Zero harm</b>	an approach to occupational safety with the goal of operating a workplace without exposing an individual to injury through the implementation of safe work systems
<b>Zero waste</b>	no operational solid waste, excluding waste generated by exceptional projects such as construction or demolition works

Forward-looking statements

This Sustainability Report contains certain forward-looking statements based on DS Smith's current assumptions and expectations, including statements regarding our targets, goals, commitments and programs and other business plans, initiatives and objectives, including but not limited to our Now & Next Sustainability Strategy and related goals. Certain statements in this report that are not historical in nature may be considered 'forward-looking statements' within the meaning of the Private Securities Litigation Reform Act of 1995, as amended. Forward-looking statements can be identified by the use of forward-looking or conditional words such as 'expects', 'anticipates', 'aspires', 'believes', 'estimates', 'could', 'should', 'can', 'forecast', 'intend', 'look', 'may', 'will', 'remain', 'confident', 'commit', 'roadmap', 'goal', 'target', 'opportunities', 'objectives' and 'plan' or similar words and expressions. In addition, statements are forward-looking statements if they refer to (i) our goals, objectives, future commitments and programmes; (ii) our business plans and initiatives; (iii) standards and expectations of third parties; (iv) our assumptions and expectations; and (v) the scope and impact of our corporate responsibility risks and opportunities. Our actual future results, including the achievement of our targets, goals or commitments, could differ materially from our projected results and commitments as the result of changes in circumstances, including our acquisition by International Paper Company, assumptions not being realised or other risks, uncertainties and factors. These statements are not guarantees of future performance and reflect management's current views and speak only as to the dates the statements are made and are subject to risks and uncertainties that could cause actual results to differ materially from those expressed or implied in these statements. Factors which could cause actual results to differ include but are not limited to: (i) risks with respect to climate change and global, regional, and local weather conditions, as well as risks related to our ability to meet targets and goals with respect to climate change and the emission of greenhouse gases (GHG) and other environmental, social and governance matters, including our other Sustainability Strategy and related goals; (ii) the emergence and implementation of mandatory climate reporting standards and the continued development of voluntary standards and frameworks that may result in definitional or other changes, including those that may alter how our GHG emissions are calculated and reported both historically and prospectively; (iii) the costs of compliance, or the failure to comply with, existing and new environmental (including with respect to climate change and GHG emissions), tax, labour and employment, privacy, anti-bribery and anti-corruption, and other governmental laws and regulations; and (iv) loss contingencies and pending, threatened or future litigation, including with respect to environmental-related matters. DS Smith undertakes no obligation to publicly update any forward-looking statements, whether as a result of new information, future events or otherwise, unless required by law. In addition, the sustainability initiatives and/or goals described in this Sustainability Report are aspirational and may change. Statements regarding our initiatives and/or goals are not promises that they will be met. In some cases, we may determine to adjust our commitments, goals or targets or establish new ones to reflect changes in our business, operations or plans and our integration into International Paper Company's broader corporate policies and sustainability strategy.

## Comments about our Sustainability Report

We are committed to continuing to develop our Sustainability Report to keep our stakeholders informed about the progress we are making.

The team can be contacted via email at [sustainability@dssmith.com](mailto:sustainability@dssmith.com)

DS Smith is now an International Paper company. To learn more about sustainability at International Paper, please visit [www.internationalpaper.com/sustainability](http://www.internationalpaper.com/sustainability)



### DS Smith Plc

Level 3  
1 Paddington Square  
London  
W2 1DL

Telephone  
+44 (0) 20 7756 1800

### Keep in touch

 @dssmithgroup  DS Smith  dssmithgroup

 @dssmith.group  DS Smith

