ArdaghGroup

Ardagh Group – tax strategy statement

This tax strategy statement, which has been reviewed and approved by the Group Chief Financial Officer, communicates the approach to the management of all taxes by all entities within the wider Ardagh Group[1] ("Ardagh" or "the Group") and is updated annually. This document is in relation to the financial year ending 31 December 2026.

Our tax strategy

The Group pursues a tax strategy that is aligned with the Group's business strategy. The following principles govern the strategy:

- Full compliance with all local tax laws and reporting obligations;
- Management of tax obligations in a proactive manner, in accordance with the legislative requirements and the spirit of tax law in each jurisdiction in which the Group operates;
- Maintaining good working relationships with tax authorities in each jurisdiction;
- Mitigation of tax risks throughout the Group by ensuring appropriate processes and controls are in place; and
- Transactions between Group companies are conducted on an arm's length basis in accordance with appropriate transfer pricing rules and OECD principles.

When making commercial decisions, the Group takes a holistic view of all relevant factors, including tax. The Group does not enter into artificial tax arrangements and all transactions must have a business purpose and/or commercial rationale. We do not use tax haven jurisdictions to manage taxes. In addition, due consideration is given to the Group's reputation, brand, and corporate and social responsibilities, as well as to the relevant applicable laws and regulations and the legal and fiduciary duties of directors and employees of the Group.

Approach to risk management and governance arrangements in relation to taxation

As a multinational business with operations in 16 countries, Ardagh is often subject to uncertainties stemming from governmental actions in respect of taxes paid and payable in each of our operating jurisdictions. In addition, tax legislation is not always clear and can be open to interpretation. The Group Tax team applies the Group's Enterprise Risk Management framework to identify, monitor and manage key tax risks and to ensure mitigating controls are in place.

The Group adopts the same approach to tax risk management as it does to all business risks. Ardagh is committed to ensuring that all tax liabilities and reporting obligations are met. In this regard, Ardagh has established internal controls and procedures to ensure that all taxes are paid in full, all reporting obligations are satisfied, and tax laws and regulations are adhered to.

The Board of Ardagh Holdings S.A. has overall responsibility for tax within Ardagh. Tax is part of the Finance function of the Group and is the ultimate responsibility of the Group Chief Financial Officer. Responsibility for the day-to-day implementation of the tax strategy has been delegated to the Chief Tax Officer, who reports directly, and is accountable, to the Group Chief Financial Officer on all tax related matters. The Chief Tax Officer is responsible for ensuring that the Group has the appropriate level of resources and the right level of skills to deal with the Group's tax affairs. The Chief Tax Officer engages an appropriately qualified and experienced Group Tax team, which maintains technical knowledge, undertakes continuing professional development, and operates with professional care and integrity, at all times. The Group Tax team is responsible for putting in place adequate controls to ensure the correct operation of tax across the Group. The Group Tax team maintains strong cross-functional relationships with colleagues across the Group, and uses the operational knowledge gained

[1] The Ardagh Group includes Ardagh Holdings S.A. and each of its direct and indirect subsidiaries. Ardagh Metal Packaging S.A. and its subsidiaries are not covered by this tax strategy statement. Those entities are covered by a separate Ardagh Metal Packaging S.A. tax strategy.

from these relationships, to identify tax risk, and help manage this tax risk by promoting the principles governing the tax strategy.

Ardagh maintains a suite of documented tax process controls which are audited by both the internal and external audit teams on an annual basis. The internal audit team plays an important role in independently monitoring and testing our key financial controls, including those for tax, and they report on their effectiveness to the Audit Committee of the Board of Ardagh Holdings S.A.

The Group continues to monitor developments in international tax legislation and transparency requirements. In particular, the Group has established processes and controls to comply with the OECD Global Anti-Base Erosion (GloBE) Rules (Pillar Two) and other significant international tax developments. The Group Tax team works closely with relevant stakeholders across the business to assess, implement and monitor compliance with these obligations.

Ardagh also maintains a Tax Governance Policy which outlines both the Group Tax department structure and each Local Finance Function's roles and responsibilities, and also the tax control environment and procedures in place.

The Chief Tax Officer has delegated responsibility for tax. The Chief Tax Officer consults with the Executive Chairman and the Group Chief Financial Officer where appropriate, e.g., based on the materiality of a transaction, or where there is any risk or perception that a course of action could have potentially adverse implications for the Group's brand or reputation. The Chief Tax Officer and the Group Tax team seek external advice from external tax advisors where particular risk issues are of a nature benefiting from external input or where there is doubt as to the correct tax treatment. This advice is fully reviewed by the Group Tax team and assists in the assessment of risk, and ultimately, any decisions made. Tax compliance is the primary responsibility of the Local Finance Function, with support and oversight from the Group Tax team. The Local Finance Function is responsible for bringing to the attention of the Group Tax team any transactions which might have a significant tax impact or any tax irregularities, in addition to immediately notifying Group Tax upon receipt of a tax audit notification. The Local Finance Function will also engage with external tax advisors, where appropriate.

The Group aims to ensure that all intragroup transactions (involving the transfer of goods, tangible property, services, intangibles, and the provision of finance) between companies within the Group are conducted on an arm's length basis. The Group Tax team is responsible for documenting the arm's length nature of intragroup pricing policies, and ensuring that all OECD / EU / UK transparency reporting obligations, that have been incorporated into local legislation in the countries in which Ardagh operates in, are complied with in a timely manner. To this end, Country-by-Country Reporting requirements are fully complied with in the appropriate jurisdictions.

Transparency on tax matters

Ardagh is committed to acting with appropriate transparency on all tax matters, and to complying fully with all tax laws. Ardagh does not enter into tax arrangements that do not have a business purpose and/or commercial rationale. In addition, due consideration is given to the Group's reputation, brand, and corporate and social responsibilities. We are committed to ensuring full compliance with the legislative requirements of all tax laws and regulations.

We continue to work with external advisors and other stakeholders as part of the ongoing international tax reform consultation process, the aims of which include increasing tax transparency.

Approach to tax risks

The Group's objective is to comply with its tax and legal requirements in a manner that ensures full compliance with all tax laws. Given the complexity and continuously evolving nature of international tax law, which can often be subject to different interpretations, we acknowledge that there will always be some level of tax risk borne by the Group. Overall, we have a considered and measured approach

to minimising tax risk. The objective, to minimise tax risk, is aligned and consistent with the wider commercial decisions made by the Group.

Approach towards dealing with tax authorities

The Group seeks to comply fully with all tax laws, making sure that all filings are submitted on a timely basis, with full disclosure. The Group is committed to maintaining good working relationships with tax authorities and employs a cooperative, collaborative, and, as the need arises, proactive approach. Any requests for information from a tax authority are responded to in a timely manner. The Group demands integrity, openness, and competence from all Group employees and external advisors in all dealings with tax authorities. In addition, where local laws and/or practice permit and where the Group believes it is appropriate to do so, the Group approaches tax authorities for feedback where there are uncertainties in respect of tax positions.

UK requirements

Whilst this tax strategy statement is applicable to all entities in the Group, for clarity, it specifically communicates the approach to the management of all UK taxes by UK entities ("the UK Group") within the Group, for the purpose of specific UK legislative requirements[2]. In this regard, this document is published in accordance with Schedule 19 of Finance Act 2016 and the UK Group considers the publication of this document as complying with its duties under paragraph 19(2) of Schedule 19 of Finance Act 2016 in relation to the financial year ending 31 December 2026. Furthermore, the UK Group is committed to maintaining a positive relationship with HM Revenue & Customs ("HMRC"), and we actively engage with our HMRC Customer Compliance Manager to encourage a transparent and co-operative relationship.

[2] UK entities that are subsidiaries of Ardagh Metal Packaging S.A. are not covered by this Ardagh Holdings S.A. tax strategy. Those UK entities are covered by a separate Ardagh Metal Packaging S.A. tax strategy.