ArdaghGroup

# Code of **Conduct**

It's always the right time to
do business the right way

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# Message from the Chair and CEOs

We at Ardagh are committed to operating in an ethical and honest way and complying with all applicable laws.

Our Code of Conduct has been prepared to provide guidance for our business and all those with whom we work. It sets out the framework of how we should deal with each other and our customers, suppliers and stakeholders. Crucially, our Code of Conduct is built around our Purpose: "We make packaging for good" and our Core Values of Inclusion, Trust, Teamwork and Excellence.

Our Code of Conduct applies to all our employees. Every employee is responsible for reading and following it. If you have any questions or concerns about your own conduct or that of any other person, we encourage you to speak up and share your concerns. In the first instance you should raise issues with your line manager. Alternatively, you may contact a member of Group Legal & Compliance or raise your concerns anonymously through our Speak-Up Hotline.

Working in line with our Code of Conduct will enable us to continue building a business of which we can all be proud, and which reflects our ongoing commitment to our customers and our respect for each other.

**Mark Porto**
Executive Chair of Ardagh Holdings S.A.

**Oliver Graham**
Chief Executive Officer Ardagh Metal Packaging

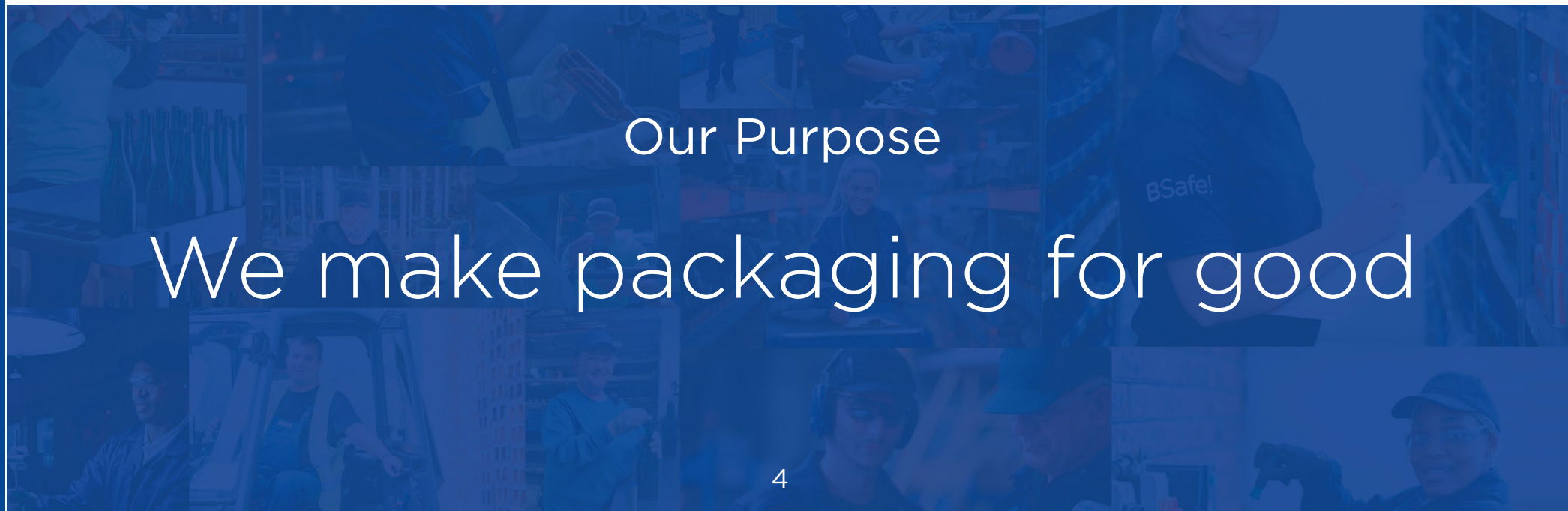
**Mike Dick**
Chief Executive Officer Ardagh Glass Packaging

# Our Purpose and Core Values

Our business environment is constantly changing. However, what will not change is our commitment to our Purpose and our Core Values. These define who we are as a company and form the foundation of our business. They demonstrate our commitment to our customers, suppliers and stakeholders, and our respect for each other.

Our employees share much more than a strong brand and an excellent reputation. We each share a common Purpose - We make packaging for good. Our Purpose enables us to deliver customer innovation, provides an inspirational environment for our teams and drives our business through growth and development.

The future we're creating is built around our four Core Values of Inclusion, Trust, Teamwork and Excellence. We are committed to conducting our activities with the highest standards of integrity.



# Our Core Values

## Inclusion

Inclusion ensures we are mindful of others, inviting contributions from everyone and valuing our diversity of thought. We all need to be comfortable and confident to be ourselves while at work.

## Trust

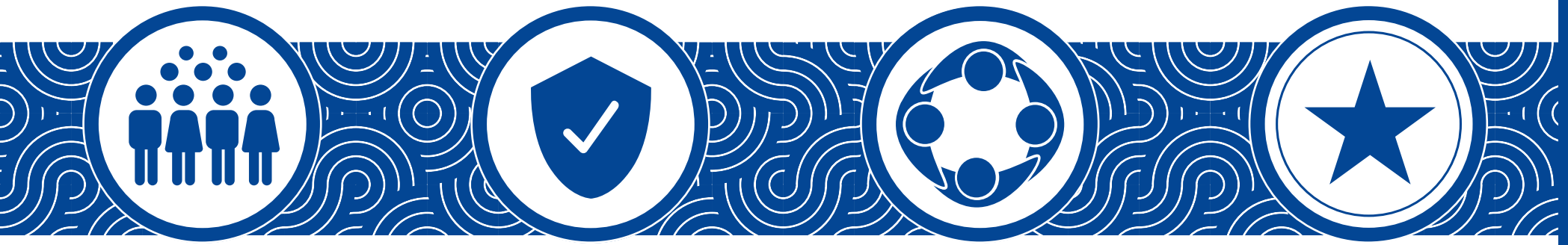
Trust is earned by displaying attributes that show we are respectful, reliable, consistent and honest in our approach to others. It is built on mutual respect, personal integrity and transparency.

## Teamwork

Teamwork is achieved with collaboration and communication. Working together as one team enables us to identify hazards, work safely and prevent incidents. Teams should be mindful of the impact their decisions have on other teams, and the business.

## Excellence

Excellence is our continual pursuit of self-improvement through learning and development, as well as our commitment to elevate the business to greater heights.



Inclusion Trust Teamwork Excellence

# Doing business the right way

## What is our Code of Conduct?

We are committed to operating with the highest standards of integrity and honesty and to complying with all applicable laws and regulations in all dealings within our business, with others (including customers, suppliers and public authorities), and with the communities in which we operate. Our Code of Conduct (our "Code") is the framework for achieving this commitment and sets out principles and clear expectations about what we consider acceptable behaviors.

The principles in our Code are not intended to be all-inclusive, but they do provide the necessary guidance on our established way of doing business. Throughout our Code you will see references to various related key policies. In addition to these, further policies and guidelines supplement or implement the principles of our Code. Any such policies or guidelines, whether issued at group, business or local level, are available via our intranet, myArdagh, and must be followed.

Our Code should be used as a guide for conducting business in a compliant, honest and professional manner and should be considered in determining all business decisions and actions. By doing so, we strengthen our business, create and maintain a culture based on our Core Values, and ensure that we are doing business in the right way.

We are committed to operating with the highest standards of integrity and honesty.

# Doing business the right way

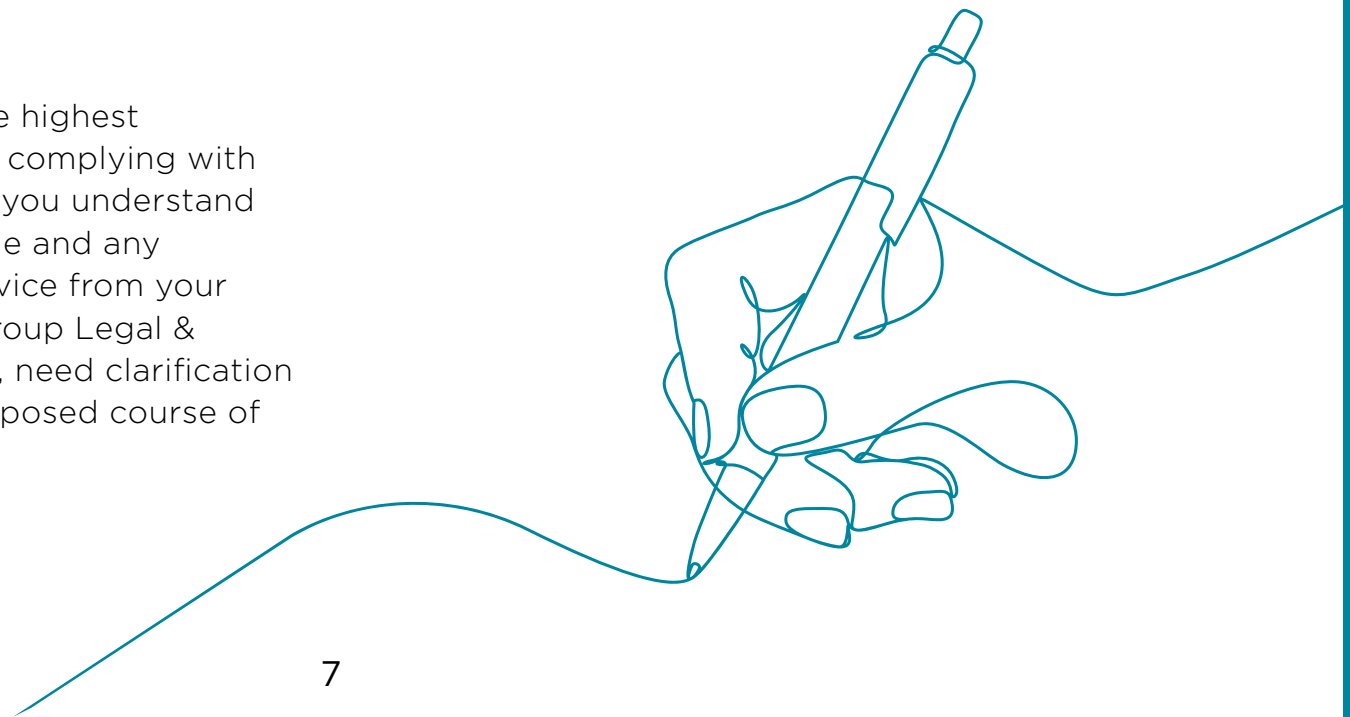
## Who does our Code apply to?

Our Code applies to everyone in our business, including all Ardagh directors, officers and employees worldwide (collectively "employees") in all of our global Ardagh Group companies and any joint ventures controlled by Ardagh. We also expect that all our business partners adhere to the principles and values set out in our Code. Our Code always applies while we are working on Ardagh premises, at off-site locations while conducting Ardagh business or at any place where we are representing Ardagh.

## Our responsibilities

We are all responsible for meeting the highest standards of integrity by reading and complying with our Code. You should make sure that you understand both the principles set out in our Code and any policies implementing these. Seek advice from your line manager, Human Resources or Group Legal & Compliance if you do not understand, need clarification or if you are unsure whether your proposed course of action is appropriate. If you ever see or suspect any conduct that is in violation of, or inconsistent with, our Code, you should immediately speak up.

You are also expected to be familiar with the legal and regulatory requirements that are applicable to your business responsibilities and to fulfill your duties in accordance with them. Questions concerning the applicability of any laws or regulations should be directed to Group Legal & Compliance.



# Doing business the right way

## Manager responsibilities

If you are a manager, you must act as a role model, always setting a good example for your team and demonstrating your commitment to the principles set out in our Code through both your actions and words.

You are responsible for building an ethical culture and making sure your team understands how to live by our principles. Where employees come to you with questions or concerns, you should address and respond to these promptly, and where necessary escalate issues. You should also seek guidance where you are unsure of the proper course of action, or would benefit from another perspective, and you must always speak up and report behaviors that are unethical or inconsistent with our Code.

Managers have a special responsibility to act with the highest standards of integrity.

## Sanctions

Failure to comply with our Code, our policies and applicable laws may result in disciplinary action. Such action will always be in accordance with applicable law, and may include training, counseling and termination of employment. In addition, we may bring violations of

# Doing business the right way

criminal laws to the attention of the appropriate law enforcement authorities.

## Waivers

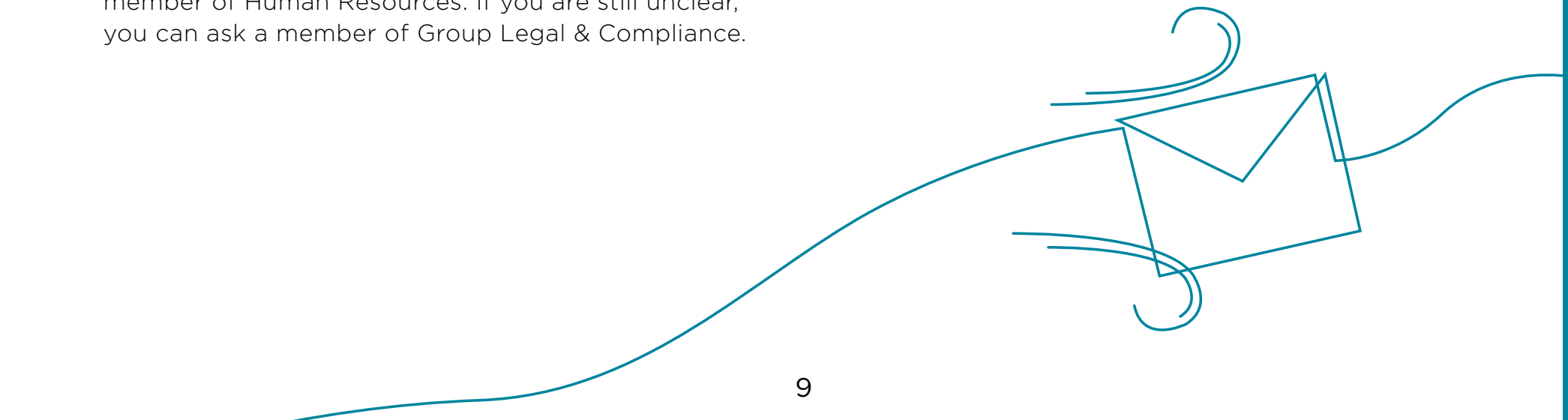
In the unlikely circumstance that a waiver to our Code should become necessary, you must contact the Company Secretary. Any waiver by a director or officer requires prior approval from Ardagh Holdings S.A.'s board of directors.

## Getting help

Our Code covers many scenarios, but it is not exhaustive. If you need any assistance in understanding our Code, you should ask your line manager or a member of Human Resources. If you are still unclear, you can ask a member of Group Legal & Compliance.

**Here are some questions that you can ask yourself to see whether behaviors or practices are compliant:**

- Is this legal?
- Is this consistent with our Code of Conduct and policies?
- Does this look and feel right?
- Could this harm your or our reputation?



# Doing business the right way

## Speaking up

It is crucial that you speak up if you see or suspect any violation of our Code, our policies or the law. You should first raise concerns with your line manager. If you are uncomfortable with doing this for any reason you can contact a member of Human Resources or Group Legal & Compliance.

Another avenue to report concerns is via our "Speak-Up Hotline". Our Speak-Up Hotline is operated by an independent third-party and allows all employees the opportunity to report concerns in a confidential, secure and effective manner. Subject to local laws, reports may be made anonymously. Our Speak-Up Hotline can be accessed online via ardaghgroup.ethicspoint.com, and via local toll-free numbers in all the countries in which we operate. More information on accessing our Speak-Up Hotline is set out in the Resources section at the end of this Code, together with contact details for Group Legal & Compliance.

We take all concerns reported seriously and reports received via the Speak-Up Hotline will be handled by qualified investigators.

### *No retaliation*

We will not permit retaliation of any kind for reporting information in good faith, which means telling the truth as you believe it to be. You can report concerns about violations of our Code, or other any other illegal or unethical conduct, without the fear of retaliation or discrimination, including without the concern that you might be disciplined or considered for dismissal as a result of speaking up.

### Related policy:

Speak-up and Whistleblowing Policy

**Suspect a breach of our Code of Conduct? You can speak to:**

- Your line manager
- Human Resources
- Group Legal & Compliance
- Our Speak-Up Hotline

# We value our people and their safety

We are committed to ensuring that our employees and any third parties are safe in our workplace. Our production facilities, service centers and offices should be a place where people enjoy coming to work and can go safely home afterwards, and where everyone is treated with fairness and respect.

## Workplace Health and Safety

Safety is integral to our business. It is our commitment to provide a healthy and safe workplace for all employees, contractors and visitors, and comply with all applicable health and safety laws and regulations. We have established our “BSafe!” safety management framework. This framework sets out processes for driving continuous improvement, transfer of lessons learned and strengthening of safety culture. By managing workplace behaviors and practices, we can reduce the risk of occupational injuries and illnesses.

Whilst we have frameworks, systems and controls in place, we are all collectively responsible for creating a safe workspace – including in our production facilities, our service centers and our offices.

# We value our people and their safety

You must comply with health and safety instructions and follow our processes to reduce workplace risks and unsafe behaviors. You must immediately report any hazards to your line manager. This reporting allows us to respond and learn from all incidents.

**Related policy:**

Health and Safety Policy

## What can we do?

*An urgent job is required on-site. A local contractor is available at short notice to assist. Can we bring them in even if the job has not yet been risk assessed?*

No. We must follow our internal health and safety processes and procedures, which include undertaking risk assessments to ensure safe methods of working. Furthermore, contractors must be selected in accordance with procurement policies based on a range of factors, including ensuring that they have the necessary permits to conduct the work.

# We value our people and their safety

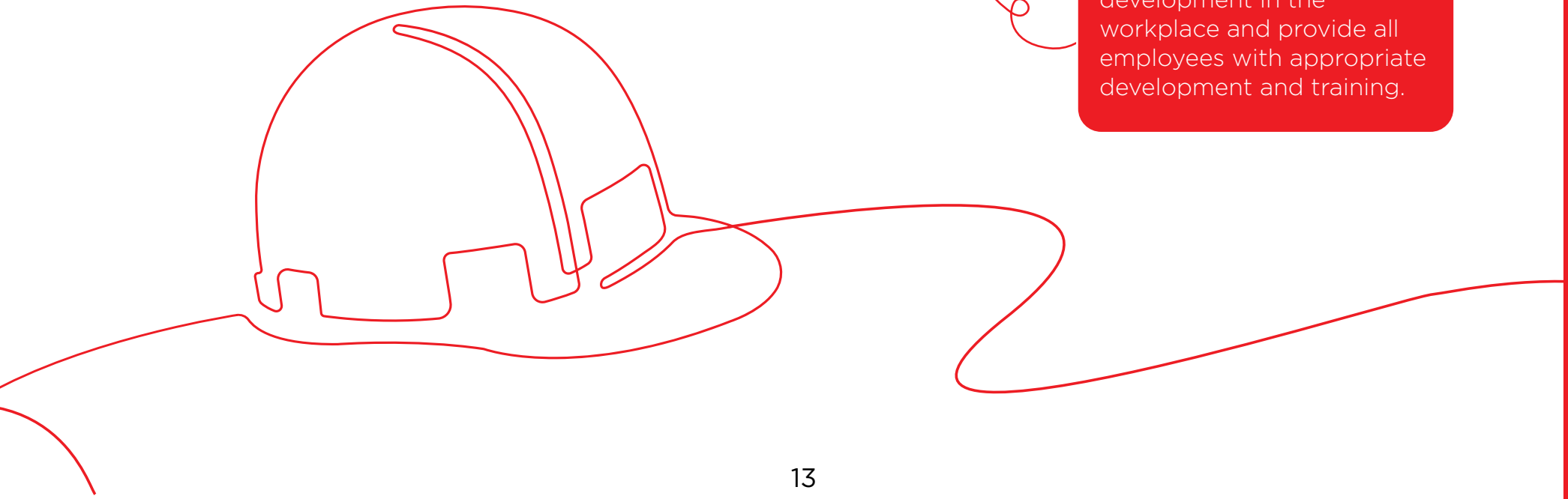
## Fundamental rights at work

We respect and comply with the International Labor Organisation ("ILO") Declaration on Fundamental Principles and Rights at Work, as well as the ILO's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy. Within these principles we support, amongst others, the freedom of association and effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of child labor, and the elimination of discrimination regarding employment and occupation. Our conditions of work, wages and other forms of remuneration comply with all relevant laws and regulations and are consistent with applicable international labor standards.

**Related policy:**

Employment Policy

We encourage employees' development in the workplace and provide all employees with appropriate development and training.



# We value our people and their safety

## Diversity, Equity and Inclusion

We provide equal employment opportunities for all applicants and employees, without taking into account factors such as ethnicity, color, religion, gender, national origin, ancestry, age, disability, marital status or sexual orientation. All our employment decisions are based on legitimate considerations, including skills, qualifications, performance, and business needs.

**Related policy:**

Employment Policy

We are committed to a working environment that promotes diversity, equity and inclusion.

## Respectful workplace

Our workplace should be one where everyone is respected and valued. We promote performance, teamwork and results through open communication. We support an “open door” management policy, and you are encouraged to raise work related concerns with your line manager.

We will not tolerate any discrimination, in accordance with our commitment to diversity, equity and inclusion. You should never engage in any discriminatory behavior or unreasonably treat others differently due to their characteristics.

Our workplace should be free of all types of harassment - we do not tolerate harassment of any kind. Harassment includes verbal, physical or visual conduct that creates an

# We value our people and their safety

intimidating, offensive or hostile working environment or that interferes with work performance and goes beyond regular business conduct. Derogatory comments based on physical appearance, religious beliefs, or neurodiversity are unacceptable. Harassment can also include sexual advances and verbal, non-verbal or physical contact that impacts work performance or creates a hostile or offensive work environment.

We have a zero-tolerance policy towards violence. Violence includes physically harming another person, shoving, pushing, intimidating, or coercing another human being or wielding weapons and threatening or talking about engaging in these activities. You must not engage in any violence or harassment, and do not use threatening or abusive language.

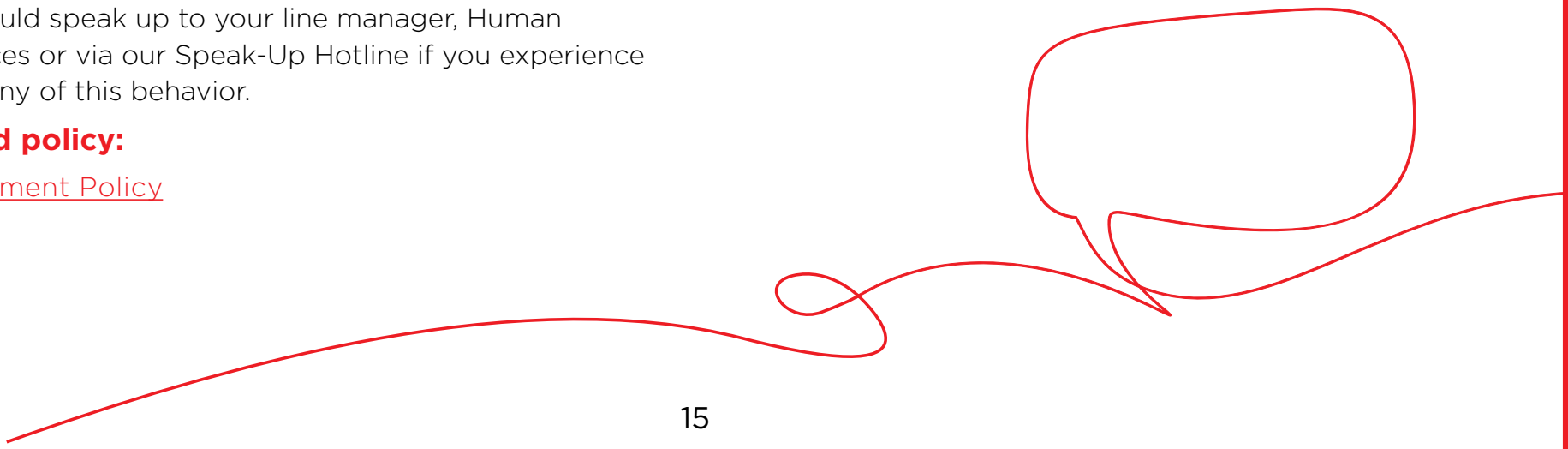
You should speak up to your line manager, Human Resources or via our Speak-Up Hotline if you experience or see any of this behavior.

**Related policy:**

Employment Policy

**Behaviors that we will not tolerate:**

- Obscene or offensive language
- Inappropriate comments or jokes
- Slander and gossip
- Sexual advances
- Unwarranted exclusion from work activities
- Targeted microaggressions and bullying



# We act ethically and with integrity

We expect all employees to act ethically and always with the highest standards of integrity and honesty. Our actions must be transparent. We will not take unfair advantage of anyone whether through manipulation, concealment, abuse of confidential information, misrepresentation, or any other unfair practice.

If you are ever unsure about whether your proposed course of action is appropriate, please seek guidance. If you ever see something that looks or feels wrong, you should immediately speak up.

## No bribery and corruption

Bribery is the giving or receiving of something of value to influence someone to improperly perform their role or to reward them for improper performance. Bribes can take many forms and can include cash and cash equivalents, gifts, entertainment, loans, offering contacts to a connected person, offers of services, or political or charitable donations.
Bribes may include also facilitation payments, which are small payments or fees requested by government officials without legal basis to speed up the performance of a routine government action. Kickbacks, another form of bribery, are payments made in return for business favors or advantages.

We do not tolerate any acts of bribery or corruption and comply with all applicable anti-bribery and corruption laws.

# We act ethically and with integrity

You must never request, offer, accept or pay bribes of any form, including facilitation payments or kickbacks.

We may also be held responsible for the acts of third parties who are involved in bribery when acting on our behalf. Make sure that any agents, representatives or intermediaries who act on our behalf understand our commitment to preventing bribery and corruption. When engaging with these third parties you must always undertake the necessary due diligence and ensure they never give or offer bribes on our behalf.

To prevent bribery and corruption, it is important to be able to spot the red flags.

**Here are some things to watch out for, particularly when dealing with agents and other third parties acting on our behalf:**

- Overinflated or unauthorized invoices
- Payments to foreign public officials
- Payments with no supporting documentation
- Unnecessary payments of money by employees

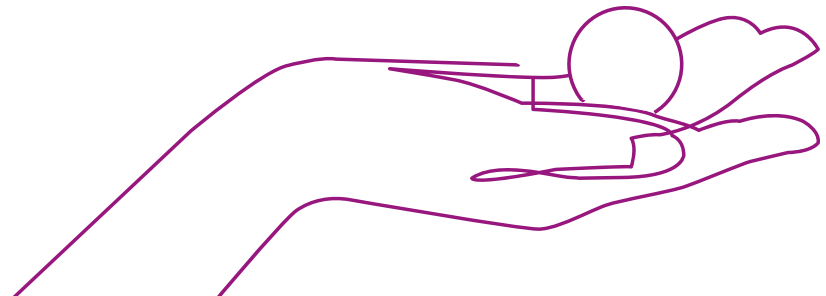
## Would this be ok?

*A potential vendor wants to provide services to our business. Their representative offers our employee free tools for a personal project. In exchange, the potential vendor asks to be awarded business with Ardagh. Is this ok?*

No, the offer of the tools to the employee is a bribe. The employee must decline the offer and report the conduct to Group Legal & Compliance. Vendors who seek to secure business by offering us bribes are acting unethically and we should not be doing business with them.

**Related policy:**

Anti-bribery and Corruption Policy



# We act ethically and with integrity

## Gifts and hospitality

The giving or exchange of modest gifts and hospitality may foster goodwill in business relationships. Legitimate gifts and hospitality are not illegal or unethical if they benefit the business or have a justifiable business purpose, are appropriate in the circumstances and are not part of a regular pattern of gift giving. However, in some instances the giving or receiving of gifts and hospitality, particularly any that are overly generous, may be perceived as corrupt if it is done with the intent of improperly influencing a business decision.

To avoid any allegations of improper conduct, you must ensure that prior to offering or accepting any gift or hospitality that:

- it is strictly limited in value and frequency
- it is in line with customary business practices
- the value is allowable under the Gifts and Hospitality Policy
- necessary approvals are obtained pursuant to our Gifts and Hospitality Policy.

# We act ethically and with integrity

Special care should be taken with respect to gifts and hospitality to government officials (such as those working for government regulatory agencies), and prior approval from Group Legal & Compliance is required before offering or accepting any such gifts or hospitality.

**Related policy:**

Gifts and Hospitality Policy

## Is this allowed?

*A new vendor offers an all-expenses paid trip for you and your family to their facility. Can you accept it?*

No, you should not accept the offer, as in all cases trips for family members would go beyond what would be necessary for work purposes. Always avoid any scenario which gives the possible appearance of improper conduct.

### When can you accept a gift?

If it is modest in value, a token gift (like a pen or a small branded item), you are ok to accept. You should not accept the gift if it is overly extravagant, if it is cash or a cash equivalent (such as a gift voucher) or if it is given in exchange for some improper or unjustified action.

# We act ethically and with integrity

## Conflicts of interest

We must all act in the best interests of Ardagh. Our business decisions must not be influenced by undue personal interest and none of us should allow our personal interests to affect our objectivity or our work.

A conflict of interest occurs when our personal or financial interests, or the interests of a close relative or friend, are or create the appearance of being adverse or competitive with Ardagh, or otherwise interfere with Ardagh's interests. Any conflict of interest may potentially impact our objectivity, and thereby interfere with our work-related decisions. Such conflict, or the appearance thereof, can undermine trust and can damage both your and Ardagh's reputation. A conflict of interest may also arise where you, or a close relative or friend, receive improper personal benefits as a result of your position at Ardagh. This would be of particular concern if you receive a loan, or guarantee of obligations, as a result of your position.

You should be able to recognize and avoid potential conflicts of interest. Conflicts may take different forms and can include having a managerial relationship with a family member, purchasing goods or services from a close relative or engaging in outside employment that interferes with your job. Where you recognize a conflict, it must be disclosed to Group Legal & Compliance.

**Related policy:**

Conflicts of Interest Policy

### Family issues?

*Your younger sibling is hired to work at Ardagh and has been assigned to your team. Would this be ok, or should you say something?*

You should speak up. Your relative reporting to you is a conflict of interest and may create the appearance that you treat him more favorably than other employees.

# We act ethically and with integrity

## Corporate Opportunities

In the course of your work for Ardagh, you may identify a business or investment opportunity that Ardagh may have an interest in pursuing. When presented with these corporate opportunities, all individuals, including directors and officers, owe a duty to advance Ardagh's legitimate interests and are prohibited from:

- taking for yourselves personally opportunities that are discovered through the use of Ardagh's property, information or your position;
- using Ardagh's property, information or your position for personal gain; and
- competing with Ardagh.

## Accurate financial reporting

We are responsible for recording all transactions accurately, completely and in a timely manner. You must never make false or artificial entries in any company records and should never understate or overstate reports of revenues or expenses or alter any company records. Reporting false information is strictly prohibited and may have serious implications for both you and our business. Reporting the proper financial condition of Ardagh is an essential aspect of each of our responsibilities.

Our financial statements must fairly and accurately present the financial condition of our business.

# We act ethically and with integrity

Reporting false information is strictly prohibited. We are responsible for the production of full, fair, accurate, timely and understandable disclosure in reports and documents that are filed with, or submitted to, regulators (including the U.S. Securities and Exchange Commission) and disclosures in other public communications.

We are all responsible for following the internal controls systems that we have put in place to protect our business. These controls should never be circumvented. Also, you may not influence, coerce, manipulate or otherwise mislead an accountant (whether internal or independent) who is engaged in the performance of an audit or review of the financial statements or affairs of our business.

If you suspect or become aware of any signs of improper conduct in this regard you should speak up.

**Related policy:**

Financial Reporting Policy

**We protect our business by:**

- Submitting reports in an honest and timely manner
- Maintaining accurate business records
- Preserving business records in accordance with our retention policies
- Cooperating fully with internal and external audits

## What should they do?

*A finance manager notices irregularities in their department's quarterly reports. What should they do?*

They should correct the reports as soon as possible. If the irregularities are persistent, there is the possibility of fraud. It is important for them to speak up as soon as possible. They can raise concerns with a member of the finance team. They can also report on a confidential and anonymous basis via our Speak-Up Hotline.

# We act ethically and with integrity

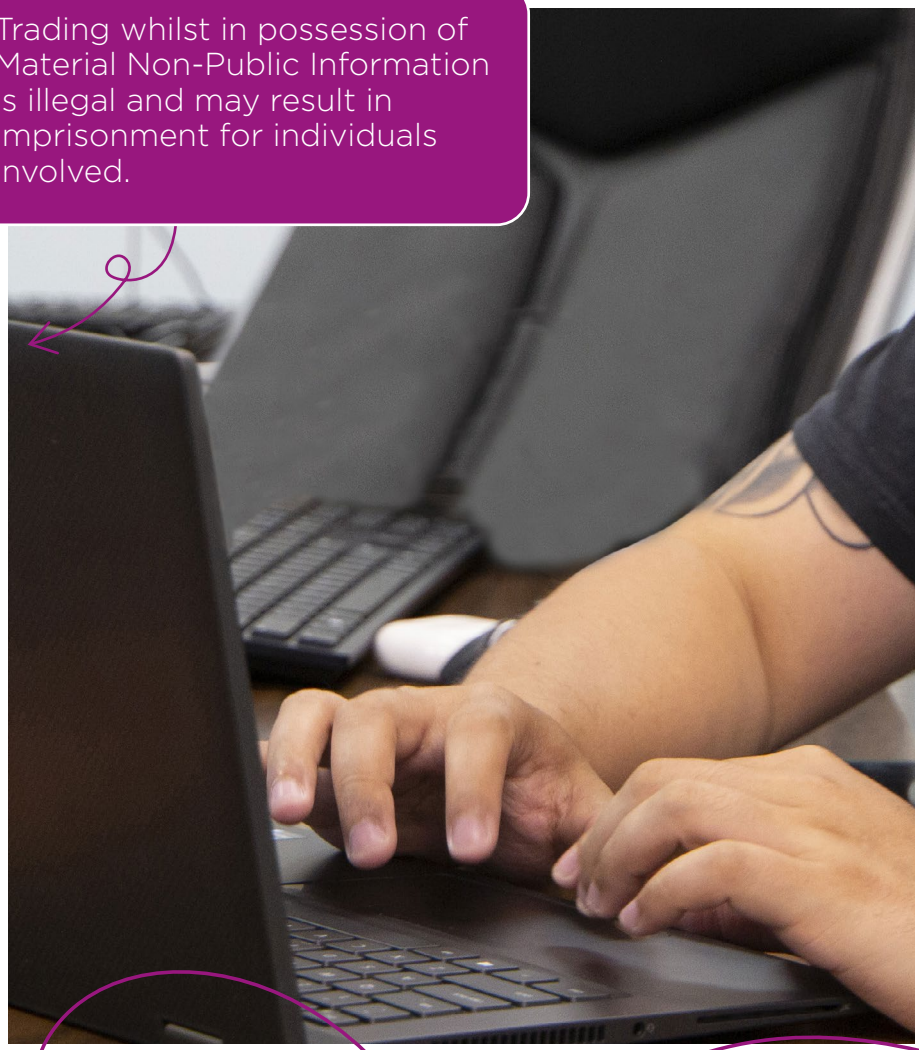
## Insider Trading

You may receive certain confidential information about Ardagh, or other companies with whom we conduct business, that is not available to people outside our business. You should not use this information, which is called “Material Non-Public Information” or “Inside Information”, to gain any unfair advantage, including through the trade in securities. This includes both Ardagh securities (including shares in Ardagh Metal Packaging S.A.), as well as the securities of other companies, if the information that you have received would affect the stock price of the other company or the value of other investment opportunities.

We all have a responsibility to keep business information confidential and not use any Material Non-Public Information for personal gain for yourself, your family, or your friends. If you are in possession of Material Non-Public Information, you must not trade until that information is released to the public and absorbed by the market or is not longer material, in compliance with our Insider Trading Policy.

This also applies to your spouse, partner, dependent family members, and those who share a household with you.

Trading whilst in possession of Material Non-Public Information is illegal and may result in imprisonment for individuals involved.



# We act ethically and with integrity

You must not directly or indirectly disclose Material Non-Public Information to anyone (also known as “tipping”), except in accordance with the Insider Trading Policy where there is a legitimate business reason to do so.

If you have access to Material Non-Public Information on an ongoing basis, you will be subject to additional restrictions relating to such information. If you have any questions as to whether certain information is Material Non-Public Information or whether you are allowed to trade, please contact the Company Secretary.

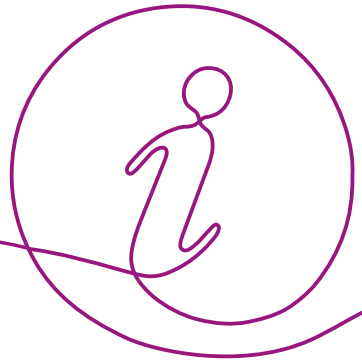
Material Non-Public Information is information not available to the general public that is of such nature that a reasonable investor would think it important in deciding whether to buy, hold or sell securities.

**Related policy:**

Insider Trading Policy

**Examples of Material Non-Public Information include:**

- Unpublished financial results
- Non-public plans of mergers, acquisitions or disposals
- Planned, but unannounced corporate leadership changes
- Planned, but unreleased, key product announcements
- Significant pending litigation or litigation outcomes that have not yet been made public.



# We act ethically and with integrity

## Competition and anti-trust compliance

We make sure that we act honestly and fairly in the marketplace. This means that as a business we achieve competitive advantages through excellent performance and not through unethical or illegal conduct.

You must not engage in any anti-competitive conduct. You must not enter into any anti-competitive agreements or understandings with a competitor, including agreements to fix prices, engage in bid-rigging, limit production, or share customers or markets. You must not exchange any commercially sensitive information, including about our prices, costs or strategy, with competitors. If your role requires you to gather competitive intelligence, you must do so lawfully, and never in an anti-competitive manner. You should take particular care to avoid anti-competitive conduct if you attend conferences, trade shows or industry associations.

You must avoid even the appearance of engaging in the restraint of trade. If you are approached to get involved in anti-competitive arrangements you should immediately reject the approach, make it clear you refuse to take part in illegal conduct and inform a member of Group Legal & Compliance.

**Related policy:**

Competition Compliance Policy

### Is this ok?

*Whilst attending a trade show, an employee from a competitor approaches you. They start talking about challenges that they are facing due to increased input costs. They suggest that it would be beneficial for the market if you could agree to pass on price increases to our customers. What should you do?*

You should immediately and clearly reject any suggestion of an agreement on pricing. Such an agreement would be anti-competitive and is not the way we do business. Make sure you inform Group Legal & Compliance about the discussion. Remember to take particular care when attending trade events where competitors are present.

# We act ethically and with integrity

## Sanctions and export control laws

If you are responsible for, or involved in, any cross-border transactions, you must make sure you are aware of the rules that apply to our business. Failure to comply with these laws may have a serious impact on our business and reputation. If you have any questions about the laws that apply to your area of responsibility you should contact Group Legal & Compliance.

**Related policy:**

Sanctions and Export Control Policy

We comply with all applicable trade laws and regulations, including import and export laws and trade sanctions.

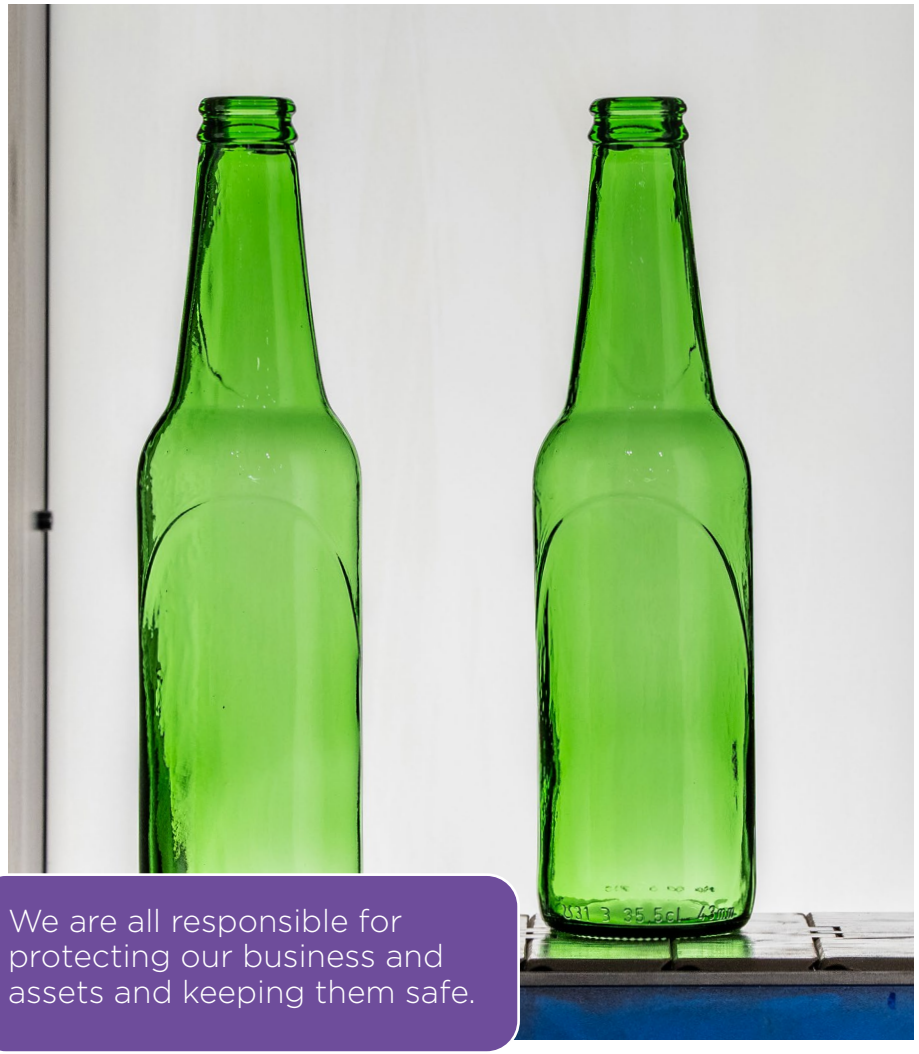
# We protect our business

Our assets form the foundation of our business that support our work every day. Our assets include physical assets (including buildings, equipment, machinery, vehicles and products), information technology systems, and our information (including confidential information and know how).

## Preventing fraud

As part of our commitment to act with integrity, we will not tolerate any incidence of fraud – whether committed by an employee or any third party. Fraud is an act or omission that intentionally misleads or deceives with the purpose of obtaining an unfair or unlawful advantage or gain. Fraud can include the unauthorized use of assets, false accounting or financial reporting, tax evasion, impersonation, or the misappropriation of assets. We are all responsible for preventing fraud within our business.

**Related policy:**
Anti-Fraud Policy



We are all responsible for protecting our business and assets and keeping them safe.

# We protect our business

## Safeguarding our physical assets

Each of us has a responsibility to protect Ardagh's assets from damage, waste, abuse and theft. We are all responsible for maintaining site security in all our locations, including production facilities, service centers and offices. Access should be limited to only those who have permission to be on our sites. If you see someone that should not be there, you should speak up.

We should also always ensure that we use our assets properly and for legitimate purposes.

**Related policy:**
Site Security Policy

### What should you do?

*You are with a colleague and see several people wearing safety jackets on site walking together. No one has a badge, and you are unfamiliar with them. You believe you know most of your colleagues. What should you do?*

You should stop them and politely ask who they are and their purpose for being on-site.

# We protect our business

## Protecting our confidential information

Our confidential information is an important asset that we must protect to secure our business. Confidential information includes intellectual property, trade secrets, know-how, personal data, as well as strategy and business decisions.

You should not disclose any of our confidential information to others, whether within or outside Ardagh, unless authorized or legally required to do so.

You should take special care when handling confidential information, such as making sure that you only access the information you need in your role, adopt appropriate security measures to protect the information and immediately report any suspected theft or abuse of confidential information.

**Related policy:**
Insider Trading Policy

**Confidential information includes:**

- Technical data or know-how
- Intellectual property
- Trade secrets
- Future product information
- Business and strategic plans
- Sensitive personal information
- Personal data

## Is this ok?

*You are excited to see in our production facility that we have started producing a new promotional packaging design for one of our customers. Can you share this news with friends?*

You should not share any information outside of the workplace which has not yet been made public. If we or our customer has already publicized the new packaging design, then feel free to share the news. If not, wait until it is public.

# We protect our business

## Protecting our IT systems

We must all take care to use our systems responsibly and to protect them and keep them secure. You must follow our policies and guidelines when working with our IT equipment and on our systems. We will not tolerate misuse of our information technology systems.

We must be cyber-savvy and be vigilant to keep our information technology systems secure from malicious actors who seek to harm our system or steal our data. One of the best ways to protect both our system and our information is by using strong passwords and never sharing these. You should be vigilant when opening emails and visiting links, especially on mobile devices.

**Related policy:**

Technology Policy

Cybersecurity Policy

You must immediately report any suspected illicit activity to our IT Security team.

## What should you do?

*You click on an attachment thinking it's ok and quickly realize that it was not a legitimate attachment. What should you do?*

You must report any concerns as soon as possible to our IT Security team.

You should always take particular care when clicking on links in emails, as they are often used by criminals to try and breach our systems.

# We protect our business

## Data privacy

We respect the privacy of all individuals, including employees and third parties, and are committed complying with all applicable data privacy laws. We are all responsible for making sure we understand and comply with relevant data privacy laws.

Personal data includes any information about an identifiable individual, such as their name, address, ID, and health information. This data may exist in many different formats including physical documents, emails, and electronic and other digital systems. You must only collect and share personal information when there is a legitimate business reason to do so and always in accordance local data privacy laws.

If you become aware of a data breach, you must immediately report this to Group Legal & Compliance.

**Related policy:**
Group Data Privacy Policy

Any concerns and questions related to data privacy should be referred to Group Legal & Compliance.

## What should you do?

*You accidentally sent an email containing personal information including names, email addresses, and identification numbers to the wrong person. What should you do?*

This might be a data breach. You should immediately contact Group Legal & Compliance. We should take special care to securely send personal data, including by encrypting information and password protecting documents.

# We care for our environment and communities

Caring for our environment and our communities is a central consideration of everything that we do. We promote healthy and safe environments, employ sustainable processes and value how we interact with our communities and society in general.

## Valuing our environment

We value our environment and are committed to protecting it. We recognize our responsibilities and are dedicated to the continued improvement of environmental performance throughout our business. We are committed to complying with relevant environmental laws and regulations, and acting in compliance with our environmental and operational permits.

We look to control our impact on the environment and ensure good environmental practices and continual improvement through environmental management systems in our production facilities, service centers and offices. You should speak up if you see any harmful environmental practices.

**Related policy:**
Environmental Policy

## What should I do?

*You notice that some equipment is leaking fluids that could harm the environment. What should you do?*

You should speak up and report whenever you see anything that looks like it could have a negative impact on human health or the environment.

# We care for our environment and communities

## Focusing on sustainability

We are committed to making a sustainable and positive impact in our communities and society in general. Our approach to sustainability is fully integrated into our business and is organized around three pillars: emissions, ecology and social well-being. We document our strategy and commitments, and the steps that we have taken to meet them, in our sustainability reports. These reports, together with further information about our sustainability efforts, can be found on our website. You are encouraged to understand our sustainability strategy and how we work to put our commitments into practice.

**We can all take steps, big and small, to support sustainable practices in our day-to-day activities. Here are some examples of what we can do on a daily basis:**

- Champion recycling efforts
- Reduce waste and reuse materials whenever possible
- Switch off lights when you leave a room
- Turn off and unplug devices that are not in use

# We care for our environment and communities

## Supporting our communities

We are committed to supporting our communities in which we live and operate. We do this in a variety of ways including through community involvement projects, which you are encouraged to participate in. We promote diversity in our industry and support under served communities through our Ardagh for Education program. Through this program we make investments in science, technology, engineering, and maths (STEM) education for students.

We support local charities in our communities and donations must comply with our Charitable Donations Policy. We do not support political parties or candidates.

**Related policy:**
Charitable Donations Policy

## What should you do?

*You are involved in a local community charity. Can you ask our customers and suppliers to support your charity?*

No, soliciting customers or suppliers to support personal charitable activities may create the appearance of impropriety or a conflict of interest. It may be that your local community charity could benefit from a donation from our local charitable budget. If you would like to seek such a donation you should speak to local management.

If you want to know more about our community projects or charitable work, speak to a member of our sustainability team.

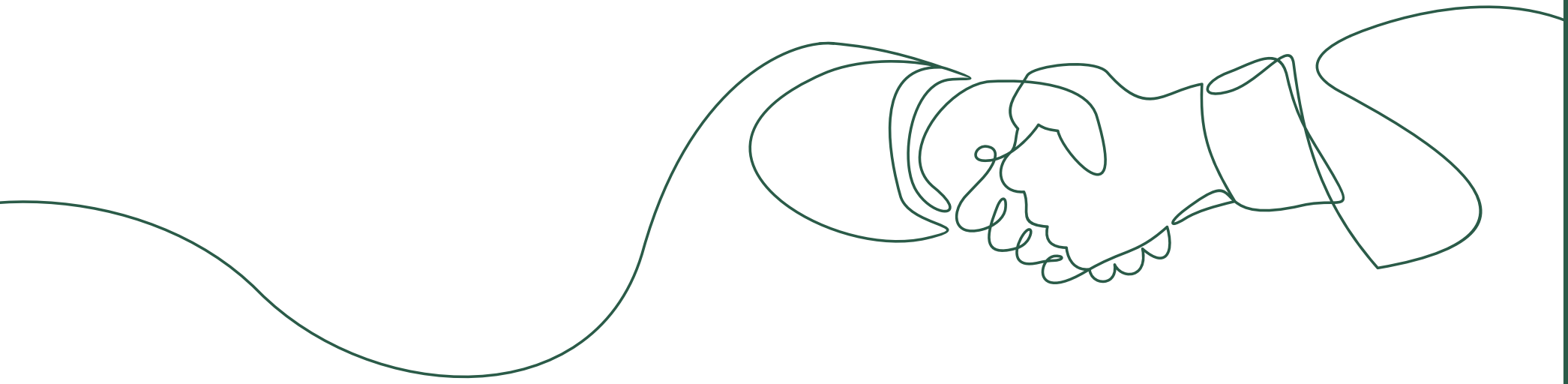
# We care for our environment and communities

## Respecting human rights and promoting social responsibility in our value chain

We respect the Universal Declaration of Human Rights and are committed to adhering to and supporting human rights, within our business and across our global supply chain. We comply and expect our suppliers to comply with all relevant human rights related laws, including those associated with safe working conditions, prevention of human exploitation (including forced labor, child labor and human trafficking), discrimination, and environmental management.

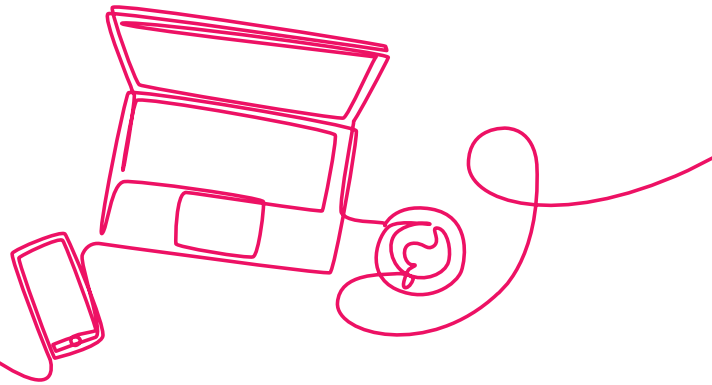
We promote social responsibility throughout our value chain and want to do business with partners that adhere to the principles and values set out in our Code. Where engaging with third parties, you must ensure that they are aware of and know they are expected to comply with these principles and values, and with our Responsible Procurement Policy.

**Related policy:**
Social Sustainability Policy
Responsible Procurement Policy



# Resources

| Resource: | For help with: | Contact: |
|---|---|---|
| Group Legal & Compliance | Concerns or questions about the Code | compliance@ardaghgroup.com |
| Human Resources | Concerns or questions about HR related issues | Your local HR manager |
| Group Finance | Concerns or questions about financial reporting | A member of local or Group Finance |
| IT Security | Concerns or questions about IT security, or to report an IT security incident | AGGRP.ITSecurity@ardaghgroup.com |
| Data Privacy | Concerns or questions about data privacy, or to report a data breach | privacy@ardaghgroup.com |
| Sustainability | Information or details about our sustainability strategy and commitments | sustainability@ardaghgroup.com ardaghgroup.com/corporate/sustainability |
| myArdagh | Access to policies and internal documents | ardagh.sharepoint.com (internal access only) |



## Speak-Up Hotline reporting options

### Online:

To report an issue through the web, please visit: ardaghgroup.ethicspoint.com

### Telephone:

Reporting hotlines are available in the countries listed in the table.

The telephone you are using must have international dialling capability.

Dial your country-specific telephone number and, if relevant, access code. Please note that all of the hotlines listed below are also available in English.

| Country | Languages | | |
|---|---|---|---|
| Austria | German | | ardaghgroup.ethicspoint.com |
| Brazil | Portuguese | | ardaghgroup.ethicspoint.com |
| Denmark | Danish | | ardaghgroup.ethicspoint.com |
| France | French | | ardaghgroup.ethicspoint.com |
| Germany | German | | ardaghgroup.ethicspoint.com |
| Ireland | English | 1800 456762 | ardaghgroup.ethicspoint.com |
| Italy | Italian | | ardaghgroup.ethicspoint.com |
| Kenya | English | 0800 221 363 | ardaghgroup.ethicspoint.com |
| Ethiopia | Amharic | 0800 861 957 | ardaghgroup.ethicspoint.com |
| Netherlands | Dutch | | ardaghgroup.ethicspoint.com |
| Nigeria | English | | ardaghgroup.ethicspoint.com |
| Poland | Polish | | ardaghgroup.ethicspoint.com |
| Serbia | Serbian | | ardaghgroup.ethicspoint.com |
| South Africa | English | 080 001 0398 | ardaghgroup.ethicspoint.com |
| Spain | Spanish | | ardaghgroup.ethicspoint.com |
| Sweden | Swedish | | ardaghgroup.ethicspoint.com |
| Switzerland | German | | ardaghgroup.ethicspoint.com |
| United Kingdom | English | | ardaghgroup.ethicspoint.com |
| USA | English, Spanish | 855 344 1555 | ardaghgroup.ethicspoint.com |

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