

2023 Ardagh Group

Sustainability report

GRI Index



GRI Index

Ardagh Group S.A. has reported in accordance with the GRI Standards for the period from 1 January 2021 to 31 December 2022. GRI 1: Foundation 2021

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
General disclosures					
GRI 2: General Disclosures 2021	2-1 Organizational details	Ardagh Group S.A. Annual Report 2022 (page 7) https://www.ardaghgroup.com/corporate/locations			
	2-2 Entities included in the organization's sustainability reporting	2023 Sustainability Report About our report page 1			
	2-3 Reporting period, frequency and contact point	2023 Sustainability Report About our report page 1			
	2-4 Restatements of information	2023 Sustainability Report About our report page 1			
	2-5 External assurance	Independent assurance			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-6 Activities, value chain and other business relationships	General Disclosures, Activities, Value chain, Business relationships and governance document			
	2-7 Employees	Ardagh Disclosures on Material Topics page 6	b. i.; ii; iii.; iv. & v. c. i. & ii. d. & e.	Information unavailable/incomplete	Data on employees are currently collected at a local level and combined for the group at a high-level which includes total number of employees broken down by gender and region. Currently the group does not have a process to collate further detailed breakdown. Within the next reporting period Ardagh will investigate whether an automated process can be implemented to collect this information without requiring heavy manual data manipulation.
	2-8 Workers who are not employees		a. i. & ii. b.: i. & ii. c.	Not applicable	Ardagh's number of workers who are not employees is not material.
	2-9 Governance structure and composition	https://www.ardaghgroup.com/bond-report/download/8/report/Ardagh-Group-S-A-Annual-Report-pdf.pdf - page 53	c. iii.; iv.; .vi.; viii.	Information unavailable/incomplete	The information is not currently formally documented

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-10 Nomination and selection of the highest governance body	https://www.ardaghgroup.com/bond-report/download/8/report/Ardagh-Group-S-A-Annual-Report-pdf.pdf [page 53]			
	2-11 Chair of the highest governance body	https://www.ardaghgroup.com/bond-report/download/8/report/Ardagh-Group-S-A-Annual-Report-pdf.pdf [page 53]	b.	Information unavailable/incomplete	This information is not currently formally documented. Within the next reporting period, Ardagh will evaluate opportunities for including this information in future reports,
	2-12 Role of the highest governance body in overseeing the management of impacts	https://www.ardaghgroup.com/userfiles/files/investors/638758d19c5a5.pdf [page 2]			
	2-13 Delegation of responsibility for managing impacts	https://www.ardaghgroup.com/bond-report/download/8/report/Ardagh-Group-S-A-Annual-Report-pdf [page 50]			
	2-14 Role of the highest governance body in sustainability reporting	Ardagh's Disclosures on Material Topics page 29			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-15 Conflicts of interest	https://www.ardaghgroup.com/pdf/code-of-conduct-en https://www.ardaghmetalpackaging.com/userfiles/files/investors/220728-AMPSA-Corporate-Governance%20Guidelines.pdf page 1 and 2	a. b. i.; ii.; iii.& iv.	Information unavailable/ incomplete	The conflict of interest requirements in the Code of Conduct applies to all Ardagh employees including the board. Our corporate governance guidelines outline such topics as: qualifications & ethical behaviours. We have corporate governance guidelines for Ardagh and AMP but only our AMP guidelines are publicly available at this time.
	2-16 Communication of critical concerns			Information unavailable/ incomplete	This information is not currently formally documented. Within the next reporting period, Ardagh will investigate if/how this information can be conveyed. Ardagh has robust processes and procedures in place to ensure that all critical concerns are communicated to the highest governance body. The process/procedure will depend on the nature of the critical concern. For example, any critical concerns related to fraud would be communicated immediately to senior management and to the Audit Committee of the board as necessary.

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-17 Collective knowledge of the highest governance body	https://www.ardaghgroup.com/userfiles/files/investors/638758d19c5a5.pdf [page 2]			
	2-18 Evaluation of the performance of the highest governance body	https://www.ardaghmetalpackaging.com/userfiles/files/investors/220728-AMPSA-Corporate-Governance%20Guidelines.pdf p4		Information unavailable/incomplete	Ardagh's corporate governance guidelines mandate the procedures for an annual self evaluation of the board. We have corporate governance guidelines for Ardagh and AMP currently only our AMP guidelines are publicly available.
	2-19 Remuneration policies	https://www.ardaghgroup.com/userfiles/files/investors/210519-AGSA-AoA.pdf	a. i.; ii.; iii.; iv.; v.; b.	Information unavailable/incomplete	This level of detail is not currently formally documented. Within the next reporting period, Ardagh will investigate if/how this information can be conveyed.
	2-20 Process to determine remuneration	https://www.ardaghgroup.com/userfiles/files/investors/210519-AGSA-AoA.pdf https://www.ardaghgroup.com/corporate/investors-corporate-governance [page 33]			
	2-21 Annual total compensation ratio	Ardagh-Group-S-A-Annual-Report-pdf.pdf (ardaghgroup.com) [page56]	a.; b. & c.	Information unavailable/incomplete	This information is not currently formally documented. Within the next reporting period, Ardagh will investigate if/how this information can be conveyed.

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-22 Statement on sustainable development strategy	2023 Sustainability Report - A message from our executive leadership team page 2			
	2-23 Policy commitments	https://www.ardaghgroup.com/pdf/code-of-conduct-en	a. i.; ii.; iii. b. i.; ii; d.; e.; f.	Information unavailable/incomplete	Ardagh's Code of Conduct describes the organisation's policy commitments for responsible business conduct. However, it does not currently formally documents all the GRI required information. Within the next reporting period, Ardagh will investigate if/how this information can be conveyed.
	2-24 Embedding policy commitments	Code of Conduct EN (ardaghgroup.com) https://www.ardaghgroup.com/userfiles/files/media-centre/AG-Responsible-Procurement-Policy-2023.pdf			
	2-25 Processes to remediate negative impacts	Code of Conduct EN (ardaghgroup.com)	a.; b.; c.; d. & e.	Information unavailable/incomplete	This information is not currently formally documented. Within the next reporting period, Ardagh will investigate if/how this information can be conveyed.
	2-26 Mechanisms for seeking advice and raising concerns	https://www.ardaghgroup.com/pdf/code-of-conduct-en			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-27 Compliance with laws and regulations	https://www.ardaghgroup.com/pdf/code-of-conduct-en	a. i.; ii.; b. i.; ii.; c. & d.	Not applicable	There were no significant instances of non-compliance with laws and regulations during the reporting period (noting that the scope of this response relates to compliance matters and does not include compliance with other areas such as environmental or health and safety laws)
	2-28 Membership associations	2023 Sustainability Report page 37			
	2-29 Approach to stakeholder engagement	General Disclosures, Activities, Value chain, Business relationships and governance document	i.; ii. & iii.	Information unavailable/incomplete	Ardagh does not currently formally documents its approach to stakeholders engagement. Within the next reporting period, Ardagh will investigate if/how this information can be conveyed.
	2-30 Collective bargaining agreements		a. & b.	Information unavailable/incomplete	This information is not currently formally documented. Within the next reporting period, Ardagh will investigate if/how this information can be conveyed.

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Ardagh's Disclosures on Material Topics document page 3			
	3-2 List of material topics	Ardagh's Disclosures on Material Topics document page 5			
Economic performance					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics document page 5			
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	https://www.ardaghgroup.com/bond-report/download/8/report/Ardagh-Group-S-A-Annual-Report-pdf.pdf 2023 Sustainability Report Page 22 & Ardagh's Disclosures on Material Topics Community Spend Sustainability Report page 5			
	201-2 Financial implications and other risks and opportunities due to climate change	https://www.ardaghgroup.com/bond-report/download/8/report/Ardagh-Group-S-A-Annual-Report-pdf.pdf [page 50]			
	201-3 Defined benefit plan obligations and other retirement plans	https://www.ardaghgroup.com/bond-report/download/8/report/Ardagh-Group-S-A-Annual-Report-pdf.pdf page F-21 [page 7]			
	201-4 Financial assistance received from government	Ardagh-Group-S-A-Annual-Report-pdf.pdf page F-21 (ardaghgroup.com) a - page 94			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Anti-corruption					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics document page 5			
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Ardagh's Disclosures on Material Topics document page 8			
	205-2 Communication and training about anti-corruption policies and procedures	Ardagh's Disclosures on Material Topics document page 8	c.; d. & e.	Information unavailable/incomplete	Data on communication and training about anti-corruption policies are currently available at a group level and not broken down by region. Ardagh will revise its monitoring process to include this level of detail in the next reporting cycles.
	205-3 Confirmed incidents of corruption and actions taken	Ardagh's Disclosures on Material Topics document page 9			
Anti-competitive behavior					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics document page 5			
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Ardagh's Disclosures on Material Topics document page 10			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Materials					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics document page 5			
GRI 301: Materials 2016	301-1 Materials used by weight or volume	2023 Sustainability Report, page 21 - list of all non-renewable materials used X:	a	Information unavailable/incomplete	For both glass and metals we report the main raw materials used. For metals, this includes aluminium and steel. For glass, this includes cullet and virgin materials which are composed of a mix of sand, soda and limestone. The quantities of other materials (coatings, other minerals, packaging etc) are not detailed, but these quantities are not significant compared to the main materials.
	301-2 Recycled input materials used	2023 Sustainability Report page 21 & Ardagh's Disclosures on Material Topics document page 11			
	301-3 Reclaimed products and their packaging materials	2023 Sustainability Report page 23			
Energy					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics document page 5			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 302: Energy 2016	302-1 Energy consumption within the organization	See Ardagh's Disclosures on Material Topics page 13 and 2023 Sustainability Report page 15 a - covered in table c- Ardagh's Disclosures on Material Topics page 13 d- not material for AGP Europe and not applicable to remainder of AGP; not applicable to AMP manufacturing site). e- Ardagh's Disclosures on Material Topics page 13 f & g methodology described in Ardagh's Disclosures on Material Topics page 14	b. & c. i.; ii.; iii. & iv.	Not applicable	All the fuels consumed within the organisation are non renewable. We do not currently report the self-generated energy as it accounts for <0.1% of total electricity needs.
	302-2 Energy consumption outside of the organization	N/A	a.	Information unavailable/incomplete	Production of glass containers is an energy intensive process. For the glass business, the majority of energy will be consumed within the organization. For the production of metal cans, a significant share of the energy consumed in the value chain will be associated with the production of raw materials. Currently, this energy consumption outside of the organization is not quantified by Ardagh. However, Scope 3 emission are quantified, and these will reflect the energy consumption outside of the organization. For the present, this information is deemed suitable for understanding and managing energy consumption in the value chain. Ardagh does not currently have plans to begin collecting this information.

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 302: Energy 2016	302-3 Energy intensity	See 2023 Sustainability Report page 15 & Ardagh's Disclosures on Material Topics page 14			
	302-4 Reduction of energy consumption		a.; b.; c. & d.	Not applicable	For the period of 2021-2022 there was no significant change in energy consumption
	302-5 Reductions in energy requirements of products and services		a.	Not applicable	Glass packaging and metal cans do not consume any energy during use
Water and effluents					
GRI 3: Material Topics 2021	3-3 Management of material topics	See Ardagh's Disclosures on Material Topics page 5			
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	301-1 -a & b 2023 Sustainability Report page 27 , Ardagh's Disclosures on Material Topics page 14			
	303-2 Management of water discharge-related impacts	2023 Sustainability Report page 27			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 303: Water and Effluents 2018	303-3 Water withdrawal	<p>a. 2023 Sustainability Report, page 27</p> <p>b. Ardagh's Disclosures on Material Topics document page 16</p> <p>c. Ardagh's Disclosures on Material Topics page 16 for limitations on data reporting - currently being reviewed and standardised across our global operations.</p> <p>d. The data is compiled on a manufacturing facility-level basis based on meter readings, site records and invoices as applicable. See Ardagh's Disclosures on Material Topics page 16 for further information</p>	For AGP only, the following information is not currently disclosed: c. i.& ii.	Information unavailable/incomplete	For AMP, 100% of water withdrawn is Freshwater. Currently a breakdown of water withdrawal and discharges according to Total Dissolved Solids for AGP sites is not held centrally. It is anticipated that 100% of the water withdrawn is Freshwater. Before the next reporting cycle, it is intended to survey the data held locally to confirm whether this is the case.
	303-4 Water discharge	<p>a-d - see Ardagh's Disclosures on Material Topics for limitations on data access page 16</p> <p>e. See Ardagh's disclosures on Material Topics page 16</p>	a. i.; ii.; iii. & iv.	Information unavailable/incomplete	Only information on Total water discharge is currently presented. Information relating to destination of discharged water is held locally but is not currently collated centrally. It is planned that information regarding destination of discharge will be available for future reporting cycles
			b i.; ii. c. i. & ii.	Information unavailable/incomplete	A breakdown of water discharges according to Total Dissolved Solids is not currently centrally available.
		d. i.; ii. & iii.	Information unavailable/incomplete	Priority substances will be determined at a local site level, according to relevant water discharge permits. This information is not currently held or compiled centrally.	

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	303-5 Water consumption	a see 2023 Sustainability Report page 27 ; b,c & d see Ardagh's Disclosures on Material Topics page 16	c.	Not applicable	Data on water storage at our operational sites is not currently available. This will be evaluated during 2023, but we do not anticipate that it will be significant volumes.
Biodiversity					
GRI 3: Material Topics 2021	3-3 Management of material topics	See Ardagh's Disclosures on Material Topics page 5			
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		All elements of this disclosure	Information unavailable/incomplete	Biodiversity reporting is a new focus for Ardagh. A process has been defined that will allow Ardagh to collate the data necessary for reporting against this disclosure within two years. The first stage of this process is to establish and report an initial baseline, which will then inform the formulation and execution of our biodiversity strategy
	304-2 Significant impacts of activities, products and services on biodiversity		All elements of this disclosure	Information unavailable/incomplete	
	304-3 Habitats protected or restored		All elements of this disclosure	Information unavailable/incomplete	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations		All elements of this disclosure	Information unavailable/incomplete	

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Emissions					
GRI 3: Material Topics 2021	3-3 Management of material topics	See Ardagh's Disclosures on Material Topics page 5			
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	305-1 - See 2023 Sustainability Report page 12 emissions chapter and Ardagh's Disclosures on Material Topics page 17 and CDP disclosure & AMP Climate submission			
	305-2 Energy indirect (Scope 2) GHG emissions	305-2 a published in our disclosure to CDP. b g See 2023 Sustainability Report [Emissions chapter page 12] and Ardagh Disclosures document page 17 .			
	305-3 Other indirect (Scope 3) GHG emissions	305-3 - a - published in our disclosure to CDP. CDP disclosure & AMP Climate submission b - g: See 2023 Sustainability Report [Emissions chapter page 12] and Ardagh's Disclosures on Material Topics page 17 .			
	305-4 GHG emissions intensity	See Ardagh's Disclosures on Material Topics			
	305-5 Reduction of GHG emissions	published in our disclosure to CDP CDP disclosure & AMP Climate submission . See also Ardagh's Disclosure on Material Topics page 17 & 2023 Sustainability Report page 12			
	305-6 Emissions of ozone-depleting substances (ODS)		a.; b; c. & d.	Not applicable	No relevant substances are used in our manufacturing processes that can give rise to ozone-depleting substances

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 305: Emissions 2016	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	See Ardagh's Disclosures on Material Topics page 17 & 2023 Sustainability Report	iii. & v.	Not applicable	As glass and metal container manufacturing do not generate significant quantities of these emissions they are not currently regulated for Ardagh operations and therefore data is not collected at all sites. Where data is collected, sampling methods may be inconsistent across sites, making collation of data inappropriate
			ii. & vi.	Not applicable	There are currently no company-wide targets for these emissions within Ardagh and therefore data is collected but not currently reported.
Waste					
GRI 3: Material Topics 2021	3-3 Management of material topics	See Ardagh's Disclosures on Material Topics page 5			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	306-1 a. i & ii 2023 Sustainability Report waste intro chapter page 25 & Ardagh's Disclosures on Material Topics page 17			
	306-2 Management of significant waste-related impacts	306-2 a & b see Ardagh's Disclosures on Material Topics page 17 ; c. 2023 Sustainability Report waste intro chapter page 25			
	306-3 Waste generated	306-3 a. & b 2023 Sustainability Report page 25 and Ardagh Disclosures on Material topics page 18			
	306-4 Waste diverted from disposal	306-4 a. & b, c, d, e - 2023 Sustainability Report - recovered waste data page 26 and Ardagh Disclosures on Material Topics Waste table			
	306-5 Waste directed to disposal	306-5 a. & b, c, d, e - 2023 Sustainability Report - and Ardagh's Disclosures on Material Topics Waste table page ;	b. iii.; c. iii.	Information unavailable/incomplete	Waste landfilled is only available as total waste landfilled, with no breakdown by hazardous and non-hazardous. This breakdown will be available for the 2023 reporting cycle.
Supplier environmental assessment					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Ardagh's Disclosures on Material Topics page 20	a.	Information unavailable/incomplete	Ardagh's supplier assessment process does not currently distinguish existing from new suppliers. Therefore, we cannot currently report on the percentage of new suppliers assessed. Within the next reporting period Ardagh will investigate how our process can be amended to capture this information.
	308-2 Negative environmental impacts in the supply chain and actions taken	Ardagh's Disclosures on Material Topics page 20	a.; b.; c.; d. & e.	Information unavailable/incomplete	Suppliers assessed are currently monitored as a percentage of procurement spent as opposed to a total number of suppliers. Actual and potential environmental impacts from suppliers assessed are identified but not currently aggregated across the whole business. Within the next reporting period, Ardagh will investigate if/how the data from suppliers assessment can be captured and aggregated to report this level of information.
Employment					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Ardagh's Disclosures on Material Topics page 21			
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Ardagh's Disclosures on Material Topics page 21			
	401-3 Parental leave	Ardagh's Disclosures on Material Topics page 21	a.; b.; c.; d. & e.	Information unavailable/incomplete	Currently our internal data collection system does not give us access to this level of detail. We comply with all local legislation in regard to parental leave. Within the next reporting period Ardagh will investigate how to provide a more detailed oversight on parental leave.
Occupational health and safety					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	2023 Sustainability Report page 32			The majority of sites for 2022 have an ISO 45001 Management system in place (Group 65% = AMP 63% + AGP 66%)
	403-2 Hazard identification, risk assessment, and incident investigation	See Ardagh Code of Conduct Appendix 10. Health and Safety Policy			<p>a: Main hazards are identified and risk assessments completed to assess the risk and to ensure adequate controls are in place to reduce the risk as far as reasonably practicable. Particular general areas to consider when identifying hazards are:</p> <ul style="list-style-type: none"> • Work related activity hazards • Infrastructure, Equipment and Materials and their design • Hazardous substances • Buildings and utilities • Design and customer interface issues • External hazards • Transport • Emergency situations • Human factors <p>The impacts are assessed for significance by considering:</p> <ul style="list-style-type: none"> • Compliance obligations • Severity of Hazard • Likelihood of Hazard

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-2 Hazard identification, risk assessment, and incident investigation				<ul style="list-style-type: none"> • Threat to the organisation • Opportunities for Hazard improvement i. Anyone who completes a risk assessment has been adequately trained to do so. This can be means of E-learning, professional certification or in-house training and assessment. ii. All risk assessments are reviewed on an annual basis by the department managers and training is rolled out to all team members. Risk assessments are used as part of BSafe! observations to ensure tasks are completed in accordance to the assessments. Risk assessments are regularly reviewed and assessed as part of ISO 45001 certification.

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-2 Hazard identification, risk assessment, and incident investigation				<p>b. All plants have some form of reporting tool for near misses or to raise opportunities to improve. All incidents go into the Ardagh Risk Management Systems (ARMS) where there is structured process to investigate any potential issues and includes a full lessons-learned-process and discussion with all business units and plants. Any corrective actions required are issued to necessary teams to implement to prevent future re-occurrences.</p> <p>c. Introduction into the company starts with H&S and discussion are had clearly stating that no person is expected at any point to work unsafe. All employees are empowered to stop any task and raise a concern. There are many forms and ways to raise issues within all plants.</p>
	403-3 Occupational health services	See Ardagh Code of Conduct Appendix 10. Health and Safety Policy			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-4 Worker participation, consultation, and communication on occupational health and safety	See Ardagh Code of Conduct Appendix 10 Health and Safety Policy			<p>Representative from the workforce are invited to represent all employees and workers, both unionised and non-unionised. Union and other safety representatives shall be corresponded with, included and provided resource as stated by legislation.</p> <p>All workers are encouraged and trained to participate in all areas of H&S. Plants have regular team talks, weekly and monthly meeting to discuss H&S topics. Employees participate in the H&S Committees which directly infom best practice. Plants encourage employees and unions to be part of inspections and audits. All plants are trained in risk assessments: how to complete these and raise concerns when developing and reviewing them.</p>
	403-5 Worker training on occupational health and safety	See Ardagh Code of Conduct page 4 & Appendix 10 Health and Safety Policy			<p>Our code of conduct sets clear expectations for all employees and all parties with whom we work.</p> <p>All workers onsite are covered by the same policy as official Ardagh employees.</p>

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-6 Promotion of worker health	See Ardagh Code of Conduct Appendix 10 Health and Safety Policy			<p>Majority of sites have regular days where an external health professional comes in and checks general body health for anyone who wants to participate.</p> <p>In addition sites have a variety of programs promoting worker health which are tailored regionally such as:</p> <ul style="list-style-type: none"> • trained mental health first aids • access to a counselling provided by Ardagh free of charge • bike-to-work schemes • physiotherapy schemes • executive workers have access to private health care schemes and doctor at hand scheme • social areas where employees can go relax and enjoy time with other workers in breaktimes • various health campaigns and promoting topics such as healthy eating exercise and regular health checks

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	See Ardagh's approach to responsible Procurement in our Responsible Procurement Policy & Code of Conduct Appendix 10			All plants have full hazard registers and legal registers which cover all areas: hazards, neighbours and local areas.
	403-8 Workers covered by an occupational health and safety management system	2023 Sustainability Report page 32			The majority of sites for 2022 have an ISO 45001 Management system in place (Group 65% = AMP 63% + AGP 66%) which covers legal requirements and have annual legal audits to which they must meet. No certified sites are working towards an ISO 45001 certification. Sites without ISO 45001 certification still have annual legal audits and work to these requirements and these are applied to all workers, visitors and contractors on site. Ardagh's H&S KPI's includes the number of temporary workers. All plants have a contractor and visitor induction system. All plants have contractor management and permit-to-work systems in place. Ardagh record all visitor and contractor incidents and manage contractors on-site as required by local legislation.

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	<p>See Ardagh Code of Conduct page 4 & Appendix 10 Health and Safety Policy + 2023 Sustainability Report page 32 - H&S section and the following:</p> <p>a. For all employees:</p> <p>i. The number and rate of fatalities as a result of work-related injury; the most serious events are reported at board level but not in our central data system due to confidentiality 2020 & 2021 = Zero</p> <p>iii. The number and rate of recordable work-related injuries; 2021 = 334 & 2022 = 318</p> <p>iv. The main types of work-related injury; Cuts, Bruising/Pain, Crush</p> <p>v. The number of hours worked. 2021 = 41968897 & 2022 = 43857219</p> <p>b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:</p> <p>i. The number and rate of fatalities as a result of work-related injury; 2020 & 2021 = Zero</p> <p>iii. The number and rate of recordable work-related injuries; We record all visitor and contractor injuries under one category : Contractor Medical: 2021 = 28 & 2022 = 23</p>	a ii.; b ii.; & v.	Information unavailable/incomplete	<p>a) ii. The number and rate of high-consequence work-related injuries (excluding fatalities); we currently don't have this as a single KPI</p> <p>b) ii.The number and rate of high-consequence work-related injuries (excluding fatalities); we currently don't have this as a single KPI v. The number of hours worked. We don't record contractor hours, but we do include all full time temporary staff into KPI's</p>

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	<p>iv. The main types of work-related injury; Slips, trips & Falls, Machine intervention and Manual Handling</p> <p>c. The work-related hazards that pose a risk of high-consequence injury, including: Working at height, Machine intervention/entrapment and Hot work</p> <p>i. how these hazards have been determined; Through Risk Assessments and analysis of incidents and lessons learned process</p> <p>ii. which of these hazards have caused or contributed to high-consequence injuries during the reporting period; Working at height and Machine intervention/entrapment</p> <p>iii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls. Ardagh follow a full investigation / root cause analysis (8D process) and lessons learnt and implement controls to prevent re-occurrence</p> <p>d. Any actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls.</p>			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	<p>Continually assessing and improving</p> <p>e. Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked. 200,000</p> <p>f. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.</p> <p>Non Excluded</p> <p>g. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.</p> <p>Very thorough data and information gathering, having global standards (BSafe!7/7+), following lean tools for analysis, event maps, root cause analysis, 8D investigation process, full plant engagements in all incident close out calls and lessons learnt and implement necessary controll to prevent re-occurrence.</p>			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-10 Work-related ill health	<p>See Ardagh Code of Conduct page 4 & Appendix 10 Health and Safety Policy and the following:</p> <p>a. For all employees:</p> <p>i. The number of fatalities as a result of work-related ill health; 2021 & 2022 = Zero</p> <p>iii. The main types of work-related ill health. Noise induced hearing loss, Occupational asthma / particulates and hand arm vibration,</p> <p>b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:</p> <p>i. The number of fatalities as a result of work-related ill health; 2021 & 2022 = Zero</p> <p>iii. The main types of work-related ill health. Noise induced hearing loss, Occupational asthma / particulates and hand arm vibration</p> <p>c. The work-related hazards that pose a risk of ill health, including: High temperatures, particulates, manual handling and Noise</p> <p>i. how these hazards have been determined; Health needs assessments in line with local legislation</p>	a ii.; b ii.; & c ii	Information unavailable/incomplete	<p>a) ii. The number of cases of recordable work-related ill health; This is not collected at global level, this is done at plant level, recorded and reported as per local legislation</p> <p>b) ii. The number of cases of recordable work-related ill health; This information is not gathered for non-employees at group level any cases are handled as per legislation on a local level.</p> <p>c) ii. which of these hazards have caused or contributed to cases of ill health during the reporting period; This information is not gathered for non employees at group level any cases are handled as per legislation on a local level.</p>

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-10 Work-related ill health	<p>iii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls. Annually reviewing health needs assessments</p> <p>d. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded. Only if classified unfit to work for a specific reason from medical advice</p> <p>e. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.</p> <p>Very thorough data and information gathering, having global standards (BSafe!7/7+), following lean tools for analysis, event maps, root cause analysis, 8D investigation process, full plant engagements in all incident close out calls and lessons learned. Followed by implementation of necessary controls to prevent re-occurrence.</p>			
Training and education					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	See Ardagh's Disclosures on Material Topics page 22			
	404-2 Programs for upgrading employee skills and transition assistance programs	See Ardagh's Disclosures on Material Topics page 22			
	404-3 Percentage of employees receiving regular performance and career development reviews	See Ardagh's Disclosures on Material Topics page 22	a.	Information unavailable/incomplete	We currently cannot currently provide a breakdown by gender and employee category Currently our internal data collection system does not give us a breakdown by gender and by employee category. Within the next reporting period Ardagh will investigate how to provide a more detailed oversight on performance and career development.
Diversity and equal opportunity					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Ardagh's Disclosures on Material Topics page 23			
	405-2 Ratio of basic salary and remuneration of women to men	Ardagh's Disclosures on Material Topics page 23			
Non-discrimination					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Ardagh's Disclosures on Material Topics page 25		Information unavailable/incomplete	Ardagh currently monitors incidents of discrimination reported through Ardagh's Compliance Hotline. Employees reporting incidents provide the information that they judge necessary, which means the level of detail on each incident can vary.
Freedom of association and collective bargaining					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Ardagh's Disclosures on Material Topics page 26	a. i. & ii. b.	Information unavailable/ incomplete	Ardagh does not currently formally document this level of detail. Within the next reporting period, we will review the countries in which workers' rights to exercise freedom of association or collective bargaining may be violated and we will provide a number and type of suppliers for each of these risky countries.
Child labour					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Ardagh's Disclosures on Material Topics page 26	a. i.& ii. b. i. & ii. c.	Information unavailable/ incomplete	Ardagh does not currently formally document this level of detail. Within the next reporting period, we will review the countries with potential risk of child labour and will provide a number and type of suppliers for each of these risky countries.

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Forced or compulsory labour					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Ardagh's Disclosures on Material Topics page 27	a. i. & ii b.	Information unavailable/incomplete	Ardagh does not currently formally document this level of detail. Within the next reporting period, we will review the countries with potential risk of forced or compulsory labour and will provide a number and type of suppliers for each of these risky countries.
Rights of indigenous peoples					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	Ardagh's Disclosures on Material Topics page 27			
Supplier social assessment					
GRI 3: Material Topics 2021	3-3 Management of material topics	Ardagh's Disclosures on Material Topics page 5			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Ardagh's Disclosures on Material Topics page 24	a.	Information unavailable/incomplete	Ardagh's supplier assessment process does not currently distinguish existing from new suppliers. Therefore, we cannot currently report on the percentage of new suppliers assessed. Within the next reporting period Ardagh will investigate how our process can be amended to capture this information.
	414-2 Negative social impacts in the supply chain and actions taken	Ardagh's Disclosures on Material Topics page 24	a.; b.; c.; d. & e.	Information unavailable/incomplete	Suppliers assessed are currently monitored as a percentage of procurement spent as opposed to a total number of suppliers. Actual and potential social impacts from suppliers assessed are identified but not currently aggregated across the whole business. Within the next reporting period, Ardagh will investigate if/how the data from suppliers assessment can be captured and aggregated to report this level of information.

